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CITY OF KENMORE

**NOTICE AND STATEMENT OF APPEAL  
OF FINAL ENVIRONMENTAL IMPACT STATEMENT  
ISSUED DECEMBER 30, 2016**

**PROJECT NAME: Lodge at Saint Edward**

**FILE NUMBER: PRJ16-0043**

Pursuant to Kenmore Municipal Code ("KMC") Sections 197.11.680 and 19.30.070, as well as Section 2.2 of the Rules of Procedure for Proceedings Before the Hearing Examiner of the City of Kenmore, Washington, Appellant Citizens for Saint Edward State Park hereby files this notice and statement of appeal of the City of Kenmore's issuance of the Final Environmental Impact Statement ("FEIS") for the Lodge at Saint Edward, File No. PRJ16-0043. The City of Kenmore issued notice of the FEIS for the Lodge at Saint Edward on December 16, 2016, and of an addendum to the FEIS on December 30, 2016. The proposed Lodge at Saint Edward is being proposed by Daniels Real Estate. The location of the proposed Lodge at Saint Edward is Saint Edward State Park, 1445 Juanita Dr. NE, Kenmore, WA 98028.

A copy of the city's notice of FEIS addendum, in which the city set an appeal deadline of January 20, 2017, is attached hereto. This notice and statement of appeal is accompanied by the statutory filing fee of \$126.00.

**NAME AND ADDRESS OF APPELLANT  
AND APPELLANT'S REPRESENTATIVES**

The name and mailing address of Appellant is:

Name: Citizens For Saint Edward State Park,  
a Washington Nonprofit Corporation  
Address: 6302 NE 151st Street  
Kenmore, WA 98028  
Phone: 425-823-6089  
Email: rdhirt@earthlink.net

The names and mailing addresses of Appellant's representatives are:

Name: Rebecca Hirt Chair of Citizens for Saint Edward State Park  
Address: 12952 74<sup>th</sup> Ave NE  
Kirkland, WA 98034  
Phone: 425-823-6089  
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Name; Peter Lance Board member - Citizens for Saint Edward State Park  
Address 6501 NE 151<sup>st</sup>  
Kenmore, WA 98028  
Phone 206-948-8922  
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Name: Ann Hurst Secretary of Citizens for Saint Edward State Park  
Address 6302 NE 151st Street  
Kenmore, WA 98028  
Phone 206-920-2024  
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### STATEMENT OF APPELLANT'S INTERESTS

Citizens for Saint Edward State Park has a great interest in protecting the natural environment at Saint Edward State Park and the park's intended use for passive outdoor recreation. Citizens have supported the park for over 12 years by being active members of Friends of Saint Edward State Park, maintaining trails and volunteering in multiple ways. Members actively use the park and live near the park or in the large surrounding area that includes Kenmore, Kirkland, Bothell, Woodinville, Bellevue and South Snohomish County. Members living near the park will be significantly affected by the off-site increase in traffic on Juanita Drive, a currently heavily trafficked road between Juanita in Kirkland and Kenmore. The proposal threatens significant adverse impacts related to traffic, noise, land use in the park, parking, drainage, air quality, noise pollution, light pollution, existing park culture, current park users, adjacent property owners, residents of the community, child safety, public services, flooding and flood-ways, wildlife, bio-diversity and flora degradation. Use and enjoyment of Saint Edward State Park by current park users will be diminished because of these impacts.

### STATEMENT OF ISSUES

Appellants provide the following specific reasons and rationales, and/or bases for this appeal. In addition to the specific reasons, rationales, and/or bases for the appeal listed below, appellants hereby incorporate all comments and arguments in all comment letters in the Final Environmental Impact Statement for the Lodge at Saint Edward Project File No. CSP16-0077 prepared by the City of Kenmore Development Services, December 2016.

1. The SEPA responsible official did not require or collect the necessary or adequate information upon which to make a decision regarding parking, traffic, drainage, air quality, noise pollution, light pollution, existing park culture, impacts on current park users, adjacent property owners and residents of the community, character and livability of the surrounding neighborhoods (including parking ingress and egress to adjacent properties), quality of life of nearby residents and pedestrians, child safety, public services, flooding and flood-ways, wildlife, bio-diversity, and flora degradation, light and glare, soil erosion, and groundwater and drainage patterns. The level of analysis and information were inadequate and fell below meeting the burden of review required by the

responsible official under the State Environmental Policy Act (SEPA), ch. 43.21A RCW, and state and local regulation implementing that law, including WAC 197-11-080 and WAC 197-11-335.

2. The proposed Lodge at Saint Edward is likely to have significant adverse and unmitigated impacts on parking, traffic, drainage, air quality, noise pollution, light pollution, existing park culture, impacts on current park users, adjacent property owners and residents of the community, character and livability of the surrounding neighborhoods (including parking ingress and egress to adjacent properties), quality of life of nearby residents and pedestrians, child safety, public services, flooding and floodways, wildlife, bio-diversity, and flora degradation, and light and glare. These impacts have not been adequately identified, analyzed, or mitigated in the FEIS.
3. The proposed Lodge at Saint Edward is likely to have significant adverse impacts on the local flora and fauna, which the SEPA responsible official has failed to adequately investigate, disclose, and/or mitigate. The proposal will permanently change the environment for plants and wildlife in the state park ecosystem. These impacts include, but are not limited to, light pollution, which will negatively affect nocturnal and non-nocturnal animals. As mentioned in the DEIS, this light pollution is likely to cause "increased orientation or disorientation" and "could affect foraging, reproduction, communication or other behaviors."
4. The EIS failed to address a projected dramatic increase in trail traffic from the hotel guests and the erosion that will be caused by the dramatic increase in such traffic may cause them to be unusable and unstable. The overuse of trails by hotel guests will impact a large number of general public park users. Many of these trails are near streams that may serve as salmon spawning grounds. The trails are currently in need of repair resulting in erosion into the streams if they are not managed correctly or planned for. These significant adverse impacts were not sufficiently analyzed or mitigated in the FEIS.
5. The SEPA responsible official failed to adequately investigate, analyze, and mitigate for lodge and conference center visitors use of public parking lots, which are grossly underestimated or unrepresented in the FEIS. The result will be intense competition for parking and a reduction in the quality and character of the park experience. Relatedly, the SEPA responsible official erred when he did not accurately or faithfully apply KMC 18.40.030 computation of off street parking. The SEPA responsible official grossly overlooked and accepted the underestimated the parking needs of the Lodge Conference Center.
6. The SEPA responsible official erred by relying on dated and inadequate traffic and parking analysis by Heffron. The city relied on an inadequate parking and traffic study and failed to clearly understand the parking/traffic issues associated with the proposed Lodge at Saint Edward. Relatedly, the SEPA responsible official failed to request a contemporary traffic and parking study, which would include a study of Bastyr University's current traffic and projected traffic growth. The result will be increased traffic on surrounding surface streets and park entrance road and in the park. By failing to

conduct a more thorough analysis of traffic and parking impacts, the SEPA responsible official violated WAC 197-11-080 and WAC 197-11-335.

7. The SEPA responsible official accepted traffic and parking analysis that will seriously underestimate traffic and parking mitigation fees due to the city of Kenmore for the Lodge at Saint Edward. Without an accurate estimate of the proposal's traffic and parking impacts, the resulting fees will be inadequate to mitigate the proposal's significant adverse environmental impacts.
8. The SEPA responsible official failed to require proof that the proposed Lodge at Saint Edward has access to offsite parking for the term of the lease. The Heffron study is misleading with suggested solutions to internal traffic and parking. No evidence was presented by Heffron that such solutions were in place and workable. The result will be difficult and/or no parking for some of the general public.
9. The SEPA responsible official failed to analyze how the Lodge at Saint Edward will be held responsible for parking and traffic impacts. The documents only stated that Daniels Real Estate would be responsible for parking for lodge and conference center guests but not how the city or Washington State Parks will be able to enforce this responsibility. The result will be that, after the Lodge is built, there will be no compelling reason for the Lodge operator to provide parking solutions. These impacts can only be mitigated by devising fines and sanctions payable to the City of Kenmore to be levied aggressively against the lodge operator to ensure "no net loss of parking for the general public would occur," the stated standard in the FEIS.
10. The SEPA responsible official did not have the lease agreement between Daniels and State Parks and could not analyze how much discretion the Daniels Lodge and Conference Center will have building the project and the impacts the lease will allow on parking, traffic, drainage, air quality, light pollution, noise pollution, park culture, impacts on current park users, adjacent property owners and residents of the community, child safety, public services, flooding and flood-ways, wildlife, bio-diversity and flora degradation. The SEPA responsible official could only guess if the lease will faithfully require the Lodge operator to carry out the intentions stated and presumed in the EIS, and many of the intentions in the EIS are silent in the lease. For these reasons, the FEIS is premised on outdated and/or incomplete information in violation of SEPA and SEPA's implementing regulations.
11. The SEPA responsible official failed to require a comprehensive accounting for the number of people that could fill each occupancy at capacity (e.g., hotel, conference facility, restaurant, bar, cafe, spa). Without a comprehensive and transparent accounting of numbers of people, the totality of environmental impacts cannot be accurately assessed for many of the impact categories included in this FEIS, particularly regarding traffic and parking and impact to general public visitors to the park. Relatedly, The SEPA responsible official failed to provide a comprehensive study of current daily visitors to the park at peak times during the months of May-September, how many cars require parking, how many current car trips to the park and the projected growth due to population increases in the area. By failing to acknowledge these data gaps, by failing to

collect the missing information, and/or by failing to justify the city's decision to proceed notwithstanding this missing information, the SEPA responsible official violated the procedural requirements of WAC 197-11-080 and the FEIS is not premised on information reasonably sufficient to evaluate the proposal's environmental impacts as required by WAC 197-11-335.

12. The SEPA responsible official did not place the findings in context, each of the impact categories (particularly traffic and parking) with the projected growth for Seattle, the Puget Sound region, Washington State and neighboring Bastyr University. This project is not occurring in a vacuum. Good planning requires the project be built with a plan for the neighbors and future growth. Responsible stewardship requires understanding how all of the pieces will come together in the future. The City of Kenmore can seriously damage future prospects for Kenmore, Kirkland and St. Edward State Park. By failing to analyze these aspects of the context surrounding the proposed Lodge at Saint Edward, the SEPA responsible official has failed to investigate the proposal's adverse significant impacts within the meaning of WAC 197-11-794 and has not collected reasonably sufficient information within the meaning of WAC 197-11-335.
13. The FEIS fails to consider significant adverse cumulative effects flowing from the city's current plan to expand the nearby ballfields and associated facilities at Saint Edward State Park. The significant adverse impacts associated with the proposed Lodge at Saint Edward will be exacerbated by similar adverse impacts associated with the ballfield expansion. Is this all we need to say here? Seems weak.
14. The Daniels project is likely to cause significant and adverse impacts on groundwater and drainage patterns in the vicinity of the site. Construction of the project is expected to interrupt natural groundwater hydrodynamics and cause significant adverse impacts on nearby landowners immediately to the north. The SEPA responsible official did not consider the impact groundwater disruption or the future increase of impervious surfaces would have on streams and shore areas in and near the park. The FEIS does not address additional impervious surfaces due to future needed parking or widening of the entry road or additional roads that State Parks may approve as indicated in the lease. The removal of vegetation and addition of impervious surface will add to the outflow from the Park to Lake Washington through streams within the park and adjacent to the park and homes.
15. The FEIS violates WAC 197-11-440(5)(c)(vii) by failing to analyze the benefits and disadvantages of delayed action on the proposed Lodge at Saint Edward, including lack of attention to the possibility of foreclosing future options for the Saint Edward Seminary Building.
16. The FEIS failed to analyze a reasonable range of alternatives as required by SEPA and SEPA's implementing regulations, including WAC 197-11-440(5) and WAC 197-11-402(9). Reasonable alternatives omitted from the FEIS include public/nonprofit uses of the seminary building as required by RCW 79A.05.025 (including partial rehabilitation and letting the south wing be cold alternatives proposed by citizens) and the possibility of using the Saint Edward Seminary as an environmental learning center.

17. The proposed Lodge at Saint Edward conflicts significantly with the Saint Edward State Park Management Plan (Oct. 20, 2008), including provisions of the management plan concerning future uses of the seminary building. The SEPA responsible official failed to adequately identify, analyze, or mitigate significant impacts flowing from the proposal's many conflicts with the management plan.
18. The various mitigation measures identified in the FEIS (including "alternative" mitigation measures) are not sufficient to reduce the proposal's adverse impacts to nonsignificant levels. As such, the FEIS has failed to disclose the project's many significant adverse environmental impacts, which, in almost all instances, are reported to be insignificant solely by virtue of the inadequate mitigation measures.
19. The SEPA responsible official did not respond to comments as required by WAC 197-11-560. In many instances, the SEPA responsible official did not address individual issues, facts, and arguments raised in public comments, or, where a response was provided, the response was not substantive or meaningful. This fell below the standard required by SEPA and SEPA's implementing regulations.
20. The FEIS failed to address the Land and Water Conservation Fund (LWCF) protections and the possibility of triggering a land use conversion. Communication between State Parks, the Recreation and Conservation Office (RCO) and National Parks Services (NPS) indicating the hotel/conference center would not trigger a land use conversion is not available for public review. The SEPA responsible official failed to clarify the definition of allowable overnight accommodations in the 2014 letter from NPS regarding LWCF 6(f)(3) protected lands. There is no indication in the FEIS that the primary target market for the hotel/conference center, spa, restaurant and café is the outdoor recreating public. Thus, the project is likely to trigger a conversion under the LWCF Act, 52 U.S.C. § 200301 et seq., and the LWCF Act's implementing regulations, 36 C.F.R. Part 59. This is a significant impact under SEPA. *See* WAC 197-11-330(3)(e).
21. The FEIS is flawed insofar as the SEPA responsible official failed to determine whether any substantive mitigation will be required under WAC 197-11-660. By failing to make that determination, the SEPA responsible official abused the discretion afforded by WAC 197-11-660 to condition or deny the project based on its significant adverse environmental impacts. Relatedly, the FEIS fails to cite applicable policies supporting the various mitigation measures, as required by WAC 197-11-660, and fails to consider separate mitigation measures based on SEPA policies adopted by the Washington State Parks Commission at WAC 352-11-665.
22. The FEIS is flawed insofar as the Washington State Parks Commission was not designated as the lead agency, as required by SEPA and SEPA's implementing regulations. Under SEPA, the city has no authority to assume the role of lead agency. WAC 197-11-938 provides, in part, "for all private projects requiring a license or lease to use or affect state lands, the lead agency shall be the state agency managing the lands in question." WAC (197-11-938(5). The proposal by Daniels Real Estate clearly requires a lease of state land. Therefore, Washington State Parks, not the City of Kenmore, is the lead agency under SEPA,

23. In review the Lodge project's probable environmental impacts, the SEPA responsible official failed to: (a) consider the environmental context of the project, in violation of WAC 197-22-330(3)(a); (b) consider the environmental effect of the projects many smaller impacts, in violation of WAC 197-11-330(3)(c) and (c) failed to consider the project's catalytic and precedential impacts, in violation of WAC 197-11-330(3)(iv).
24. The SEPA responsible official violated WAC 197-11-055 and WAC 197-11-310 by failing to issue a determination of significance at the earliest time in the administrative review process of the City of Kenmore and Washington State Parks Commission.
25. Appellants reserve the right to amend this notice of appeal as necessary to add additional assignments of error.

### **RELIEF REQUESTED**

Appellants request the Hearing Examiner grant this appeal in full, reverse the city's Final Environmental Impact Statement, and remand with instructions to correct the errors discussed above and to provide further analysis and mitigate the adverse environmental impacts of the proposed Lodge at Saint Edward State Park.

Dated this 20<sup>th</sup> day of January, 2017

CITIZENS FOR SAINT EDWARD STATE PARK

By: Rebecca D. Hyst  
Its: Chair

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## APPENDIX

1. The Responsible SEPA Official erred in his response to the letter from Phyllis Finley letter 10 in response to her question #2 **The No Action Alternative needs to be amended.** The brick is not failing. The bell tower is and always has been unheated. It has been exposed to dozens of freeze/thaw cycles. The mortar is intact. The brick is sound. Surrounding the building with a chain link fence is not necessary for the safety of the public. (If it was necessary for public safety, it should be installed immediately. Shouldn't the public be protected *now* from such a hazard?) when the

Responsible SEPA official wrote "The No Action Alternative that is analyzed in the Draft EIS is consistent with direction from the Washington State Parks and Recreation Commission regarding the management of the Seminary Building. Appendix C of the Draft EIS includes details on the management direction outlined by the Commission which identified the rehabilitation of the Seminary Building through a partnership with a public or private entity as the preferred management option. In the event that rehabilitation was determined to be unfeasible the preferred alternative management option was to vacate the building to reduce maintenance backlog and prevent the building from demolition without sacrificing recreational opportunities at the park. As part of vacating the Seminary Building, it is anticipated that fencing would be provided around the building to prevent vandalism and unauthorized access to the building."

This is consistency with the wishes of Washington State Parks Recreation Commission it is not an answer to the question that The No Action Alternative needs to be amended. Harm: The alternatives were not carefully thought through by the Responsible SEPA official. The building alternative process was not given the benefit of viable and reasonable alternative solutions for the building. Remedy to vacate the current finding and remand the No Action to a Low or No Action alternative back through the EIS process. This is not a question of Washington State Parks Recreation Commission preferences.

2.

The Responsible SEPA Official erred in his response to the letter from Phyllis Finley letter 10 in response to her question #10

#### RECREATION AND OPEN SPACE

The 9.9 acre parcel adjacent to St. Edward State Park that is proposed to be transferred offers nothing new to the public.

**Adverse Possession laws could mandate that the public maintain its current level of use on this parcel.**

**By responding** "The comment regarding the 9.9-acre parcel that would be transferred to the Washington State Parks and Recreation Commission is noted. As indicated in Draft EIS Section 3.7 (Recreation and Open Space), park visitors currently utilize portions of the 9.9-acre parcel but are trespassing on private property."

Further the Responsible SEPA official did not address the question of adverse possession and did not address in anyway the value of this trespass property to state Parks. Harm: The EIS for State Parks could consider vacating the trespass and rerouting the trail off the private property. Remedy: Vacate the EIS findings and reconsider public claims of adverse possession and/or rerouting the trail off of the private property.

The Responsible SEPA Official erred in his response to the letter from Phyllis Finley letter 10 in response to Phyllis Finley question #12:

#### TRANSPORTATION

"The project would contribute to citywide transportation improvements through payment of traffic impact fees in

accordance with the current City concurrency management program."

**Specify how this project would contribute to immediate (not citywide) transportation improvements.**

**Specify what the effects will be on the adjacent Juanita Drive.**

**This traffic situation needs to be studied *by a completely impartial consultant* at various times of the**

**day and various days of the week.**

#### The Responsible SEPA Official Responded:

Under the Washington State Growth Management Act (GMA), "concurrency" is the requirement that adequate infrastructure be planned and financed to support the City's adopted future land use plan. Level-of-service (LOS) standards are used to evaluate the transportation impacts of development growth. Traffic impact fees are one means that a City may apply to fund projects to address identified transportation impacts. Concurrency requirements are addressed at the city and county level through development and implementation of Comprehensive Plans, which receive major updates every 7 to 10 years and minor updates annually. The *City of Kenmore Comprehensive Plan* received its most recent major update in June 2015. As part of this process, the City prepared long range forecasts (through year 2035) of the traffic generated by buildout of its adopted future land use plan, and identified citywide improvements needed to address transportation impacts. Traffic impact fees were calculated to determine the level to which new development should help fund future transportation improvements, in proportion to its contribution to the traffic growth that triggers the need for the improvements. Traffic impact fees are codified in Kenmore Municipal Code (KMC) 20.47.120, and have been established as part of the City's Concurrency Management System (KMC 12.80).

The City completed a concurrency review of the proposed project and determined that it meets concurrency, meaning that the traffic it would generate is consistent with the future long-range growth assumptions that are covered by the City's Concurrency Management Program. Therefore, the project's payment of traffic impact fees would be its contribution to funding future transportation improvements in Kenmore, in proportion to the traffic it would generate. The City determines the priority for projects to be funded by all available revenue sources (including traffic impact fees) in its Capital Improvement Program, which lays out all projects to be implemented over the next six years, and is updated annually. The Capital Improvement Program is adopted annually by the City Council, and is subject to public review and input.

The Draft EIS transportation analysis also evaluated the effect of project-generated traffic on Juanita Drive NE at its intersection with NE 145<sup>th</sup> Street, where the project generated trips on the citywide street system would be highest. As described in DEIS *Section 3.12.2 Impacts*, analysis was completed for the weekday morning and evening peak hours, when the traffic generated by the project combined with the traffic on the

surrounding street system would be highest. The analysis assumed trips generated by a fully-occupied lodge during "with conference" conditions, and also took into account its cumulative traffic with trips generated by the Saint Edward State Park on a day with high recreational activity, the City's proposed ballfields project, and Bastyr University. Background growth assumptions on Juanita Drive NE (accounting for future traffic growth resulting from other development) were consistent with the City's future traffic demand forecasts described above. Together, these assumptions provide a conservative typical "worst case" condition that was analyzed, resulting in LOS C (average delay under 35 seconds per vehicle) conditions during both peak hours, as shown in Table 3.12-4 of the Draft EIS. This meets the City's standard of LOS D for arterial intersections, which would allow average delay of up to 55 seconds per vehicle (described in more detail in Attachment A of the Transportation Technical Report, provided as Appendix H of the Draft EIS). Therefore, the DEIS transportation analysis concluded that no adverse traffic operational impact would result from the project, and no additional mitigation would be needed. Because the analysis assumed a typical worst case time of day and day of week, there was no need to evaluate other times of day or days of the week because they would have better operation than the periods evaluated. The transportation analysis completed for the proposed project was impartial, following best practice procedures established by the Institute of Transportation Engineers (ITE) and consistent with the City of Kenmore's guidelines. The project analysis was coordinated closely with transportation reviewers at the City, including scoping of the transportation and parking analysis with the City staff prior to its initiation, and the analysis and report were reviewed by the City and Washington State Parks prior to its finalization for the Draft EIS.

**Harm:** The analysis was faulty and did not answer Finley's questions. **Specify how this project would contribute to immediate (not citywide) transportation improvements. Specify what the effects will be on the adjacent Juanita Drive. The Hefron study is speculative and faulted.**

**Remedy is Ms. Finley's statement This traffic situation needs to be studied by a completely impartial consultant at various times of the day and various days of the week. In addition the study must be seasonally adjusted. Vacate the FEIS finding and remand this issue for further study.**

3.

The Responsible SEPA Official erred in his response to the letter from Phyllis Finley letter 10 in response to Phyllis Finley question #14:

**Provide details of mitigation measures that will ensure that the hotel/conference users will not use public parking.**

There are already parking challenges at St. Edward State Park. With increased population, there will be more park users.

**Identify how parking will be served in the future – 5, 10, 20 years from now to accommodate the increased population.**

More parking lots mean fewer trees and grass.

**Identify at what point the area surrounding the building becomes mostly parking lot and less forest/field. Identify the "tipping point" in the balance.**

The City of Kenmore Municipal Code Chapter 18.40 would require about 330 parking spaces for a project of this size. Daniels proposes 153.

**Specify the plan for resolving this disparity.**

If the plan is for the city to change the municipal code, this would be a blatant conflict of interest.

The 330 spaces mentioned above is for a hotel/conference center and does not encompass the day user.

**Identify the provision for parking for restaurant/spa users (not park users or hotel guests).**

**The Responsible SEPA official responds:**

The project would have responsibility for accommodating the additional parking demand that it would generate without adversely impacting the parking for Saint Edward State Park. Please see the response to Comment 12. **It is acknowledged that the proposed lodge would not be able prohibit guests from parking in the Saint Edward State Park public parking spaces if they should choose to pay**, but the following elements would provide a cost and convenience incentive for guests to use parking provided by the lodge, and disincentive for guests to use parking provided for the Park:

- The charge for on-site parking would be built into room rates and event fees, while parking at the State Park public parking areas would requires an additional paid Discover Pass.
- On-site parking would be closer to the lodge, with much of it covered, and thus would be more convenient for guests than parking at the State Park public parking areas.
- In a circumstance where the lodge may need to use valet parking to

**Lodge at Saint Edward Section III**

**Final Environmental Impact Statement Draft EIS Comments and Responses**

**3-36**

accommodate more vehicles on-site, it would still be more convenient for guests to come and go from an on-site valet station than to park at the State Park public parking areas, with no additional parking charge when they are on-site.

- In a circumstance where the lodge may need to shuttle guests to/from off-site parking to accommodate occasional larger events, the cost would be built into overall event costs and there would be no additional charge to guests when they are on-site. Additionally, since larger events typically are planned several months in advance and include invitations or other forms of notification, parking instruction to event participants, indicating how/where they should park and asking that they not use the State Park's public parking, can be provided.

While the proposed project would be responsible for accommodating the parking it generates and not adversely affecting general parking for surrounding uses including Saint Edward State Park, the lodge would not be responsible for providing spaces to accommodate additional Park-generated parking demand that is unrelated to the proposal. The appropriate amount of public parking supply for Saint Edward State Park is determined by Washington State Parks, based upon the balance the agency identifies between the parking demand that should be met and maintaining the desired overall character of the Park.

As described in the *Alternative 1 – Proposed Action/Traffic Volumes* subsection of DEIS Section 3.12 (Transportation), the hotel use, on which both the trip generation and parking rates are based, includes a mix of associated uses in addition to sleeping accommodations. The ITE "Hotel" land use category (Land Use Code 310) defines hotels as "*places of lodging that provide sleeping accommodations and supporting facilities such as restaurants, cocktail lounges, meeting and banquet rooms or other convention facilities, limited recreational facilities, and/or other retail and service shops.*" Because the proposed project's spa would be a small facility and intended to serve hotel

guests, it is also considered with the ancillary facilities that are included in the overall hotel trip and parking rates. The Cedarbrook Lodge, with rates presented in the DEIS based upon driveway counts for "with conference" conditions, included a mix of sleeping accommodations, meeting rooms, a fitness center, and on-site restaurant, similar to the proposed project. As described in the DEIS, while occupied rooms is the unit of measure, it is a proxy for the overall facility size. Trip rates are based upon driveway counts that were conducted at a similar facility when a conference was occurring, and include trips generated by conference participants, restaurant visitors, employees and hotel guests.

By the definition described above, and by which the traffic and parking analysis was based, **the proposed project is a hotel, not a conference center**, and the proposed parking supply meets the City's code requirements for a hotel.

Harm: Part 1. **"It is acknowledged that the proposed lodge would not be able prohibit guests from parking in the Saint Edward State Park public parking spaces if they should choose to pay"** No mitigation is provided for hotel users who use public parking lots even as it is acknowledged possible. Vacate this EIS. It is impossible for the hotel to live up to the standards in each alternative "no net loss of parking for the general public would occur". Invariably some conference visitors visiting the park for a conference only, will either have Discover pass or choose to pay and use public parking spaces.

Remedy: Vacate the FEIS, terminate this project.

Harm: The responsible SEPA official creates a definition where a traffic and parking analysis change the definition of lodge/conference center to a hotel when the official writes **"the proposed project is a hotel, not a conference center."** The applicant finds this to be a remarkable sleight of hand that makes no sense. This is a hotel/conference center that has a faulty traffic/parking study. In no way does the existence of a study change the definition of the project from lodge/conference center to hotel.

Remedy: Faithfully enforce KMC 18.40.030

From: Bryan Hampson  
To: Eilean Davis; Permit Tech  
Subject: FW: Lodge at SESP DEIS - Request for Extension on Comment Period  
Date: Monday, October 31, 2016 8:40:42 AM  
From: Susan Carlson [mailto:susancventures@gmail.com]  
Sent: Sunday, October 30, 2016 5:19 PM  
To: Bryan Hampson <bhampson@kenmorewa.gov>  
Subject: Lodge at SESP DEIS - Request for Extension on Comment Period

Dear Mr. Hampson,

I hope you had nice weekend and that your week is off to a good start.

I am writing to request your support in extending the current 30 Calendar Day Comment Period for the Lodge at SESP DEIS, to a 60 Business day comment period. A summary of my rationale for this request includes the following.

- 1- The current 30 day Comment Period is actually only 25 business days including Veteran's Day from the date the DEIS was made available. (10/14/16-11/14/16)
- 2- The only DEIS Public Meeting scheduled Thursday 11/10/16, just one day (Veteran's Day, 11/11/16) from the Comment Period deadline, Monday 11/14/16..
- 3- The voluminous and technical nature of the 418 page document which includes many issues of consequence to Park users deserves a 60 day, rather than 30 day, comment period.
- 4- The entirety of public outreach conducted by WA State Parks on the Lodge and its DEIS has been limited to the City of Kenmore. There has been no public outreach conducted in any of the neighboring communities many of the residents of which live in equal, if not greater, proximity to SESP than Kenmore residents.
- 5- There is a significant complexity of Cumulative Impacts resulting from the potential for both the Ball Fields and Hotel project rolling out simultaneously in SESP that requires further study.

Further detail in support of these of these points is outlined below.

- 1 - The Lodge at SESP DEIS was released October 14, which was a Friday. Comments are due November 14, which is a Monday, and only 25, rather than 30 business days. Concerned citizens have families, commitments, needs for household upkeep just like everyone. Kenmore should honor the needs of its families and base the comment period on business days rather than calendar days.
- 2 - At 418 pages, the DEIS is voluminous, technical, and presumably addresses Cumulative Impact with the Ball Fields. With so many issues, the decisions on which will irrevocably change SESP for all Washingtonians, forever, it's DEIS deserves a 60 Business Day, rather than a 30 Calendar Day, comment period which would place the deadline for comments on Friday, December 23rd.
- 3 - The opening letter to the DEIS document states, "In order to learn more about the project....a public hearing will be held November 10th". November 10th is a Thursday and allows just one business day, Veteran's Day, before the Monday, November 14th deadline. This is not sufficient time for concerned members of our committees to reflect on what they learned at the meeting, write and submit comprehensive comments on this 418 page DEIS.
- 4 - Saint Edward SP is One Park, with one set of natural, cultural and historic assets and one overall carrying capacity for the extent of uses that can reasonable occur within its boundaries and that meet the State Parks mission to provide outdoor recreation for all Washingtonians. However the City of Kenmore and State Parks appear to be driving both ball fields and hotel projects as simultaneously as separate, independent projects.
- 5 - The City of Kenmore came out with intent to issue a Determination of Nonsignificance on the Ball Fields well before the Lodge DEIS was released which is directed to include Cumulative Impacts resulting from the Hotel and Ball Fields projects combined. It is also well known by the City that the ball fields project will incur impacts to wetlands. Concerned citizens were faced with commenting on this Determination of Nonsignificance on the Ball Fields as of Sept. 30th.

6 - The Hotel DEIS was subsequently released October 14. However, with potential environmental and social impacts looming from the ball fields project at the same, or even higher level than the Hotel, Citizens needed to focus its capacity on the ball fields and turn out for the Recreation and Conservation Office funding hearing held in Olympia last Thursday 10/27.

7 - Having just spent considerable energy defending the natural grass fields in the Park, citizens are now having to turn immediately to interpreting the 418 page Lodge DEIS document with comments due 11/14.

8 - As has been the case throughout both the ball fields improvement project and Daniels Hotel project processes, State Parks and Kenmore have extended outreach no further than the City of Kenmore. SESP is a State Park, owned by citizens of Washington from throughout the State. With over 700,000 visitors per year, it is the 3rd most visited State Park in WA and heavily used by residents of neighboring communities including Kirkland, Lake Forest Park, Seattle, Bothell, Woodinville, Redmond and other communities for whom neither project has received attention. Eg. We live just off Holmes Point Road, the southern boundary of SESP, I can walk from our house, into the park. We, and every other homeowner in Kirkland, not to mention every other resident in the Puget Sound region for whom SESP is a major asset, received no direct public notice of either development.

9 - We are in the final stretch of what has been among the most controversial and important elections of our times. Much attention among concerned citizens has rightfully been directed to our national, state, county and local elections and numerous ballot initiatives included in this year's election cycle. This will and should continue to be the case through Election Day 11/8, only three days before the DEIS comment due date.

Thank you for your consideration of these comments and request. I am interested in your thoughts on the matter and can be reached either in response to this email or my cell - 202-413-3122.

With warm regards,  
Susan Carlson

#### RESPONSE TO LETTER 6

Carlson, Susan – Comment 1

1. In response to comments from the public, the City of Kenmore extended the Draft EIS public comment period from November 14, 2016 to November 18, 2016.

The comment regarding public outreach is noted. Consistent with City of Kenmore requirements, the EIS process was initiated on July 12, 2016 and a notice of a Determination of Significance and Request for Comments on the scope of the EIS was distributed to agencies, surrounding jurisdictions (including Bothell, Kirkland, Lake Forest Park and Brier), interested organizations and parties of record; the notice was also mailed to property owners within a 1,000-foot radius of Saint Edward State Park as required by KMC 19.25.060. Public notification was provided in the Seattle Times, as well as on the City of Kenmore's website. A public notification sign was posted within Saint Edward State Park as well.

Notification of the issuance of the Draft EIS was sent to the agencies, organizations and individuals listed on the Distribution List (Appendix A of the Draft EIS). Notification of the Draft EIS was also provided in the Seattle Times and on the City of Kenmore's website.

The Draft EIS includes an analysis of potential indirect/cumulative impacts from the Lodge at Saint Edward Project and other development projects in the site vicinity (including the ball field renovation project) for each environmental element

To: Eilean Davis  
From: Phyllis Finley  
5962 NE Arrowhead DR  
Kenmore, WA 98028  
RE: Draft EIS Comments  
Lodge at St. Edward State Park  
Date: November 18, 2016

As you are aware, a 30 day comment period for a DEIS of this size is highly unusual. While the City of Kenmore is following the letter of the law, it is disregarding the spirit of the law.

The Public Information Meeting on November 10, 2016 which was "scheduled to learn more about the Draft EIS information" (wording taken directly from City of Kenmore website) offered NO information about the DEIS except that it is a stage of the SEPA process (general knowledge to those in attendance).

There is an appearance of a conflict of interest when the City of Kenmore is lead agency on a project in which it will have a monetary benefit.

All maps (streams and wetlands) and other studies need to be crafted/conducted by neutral consultants, not hired by those entities (Daniels, City) who have a specified end goal.  
Explain why the particular consultants were used and what they were told was their object was.

The No Action Alternative needs to be amended. The brick is not failing. The bell tower is and always has been unheated. It has been exposed to dozens of freeze/thaw cycles. The mortar is intact. The brick is sound. Surrounding the building with a chain link fence is not necessary for the safety of the public. (If it was necessary for public safety, it should be installed immediately. Shouldn't the public be protected now from such a hazard?)

The phrases "where feasible" or "as feasible" or "as deemed feasible" need to be removed from all references to mitigation measures in every category. These phrases are vague and offer a convenient "opt out", an unacceptable option.

This phrase (or variations of it) is used repeatedly in the DEIS: "...no significant ...adverse...impacts would be anticipated."

In every category, list all unanticipated, but possible, adverse impacts – the unintended consequences.

The following SEPA categories need to be addressed:  
PLANT and ANIMALS as two separate and distinct categories  
ENERGY and NATURAL RESOURCES  
LAND AND SHORELINE  
AESTHETICS  
ENVIRONMENTAL HEALTH

The ballfield proposal (cumulative effects with Daniels project) needs to be reworded to accurately describe it as a development, not a renovation. Artificial turf, stadium lighting, chain link fencing, dugouts, sheds, and other amenities are not renovating what is historical or currently existing. These features are new developments.

The same entities who are promoting the hotel as a means to save a historical building are willing to destroy a historical landscape that is also listed on the National Historical Register.

#### PLANTS

List the specific plants found on the site and describe how the project will impact each.

#### ANIMALS

List all the animals (including birds and amphibians) which have been observed on or near the site or are known

to be on or near the site. Describe how the project will impact each.

#### WATER

Increased parking near the gymnasium will add to the velocity of water in Stream #0225, and with it its load of silt and toxins. The planned expansion of the existing flow control pond to accommodate the new parking area is inadequate. Address this issue.

#### RECREATION AND OPEN SPACE

The 9.9 acre parcel adjacent to St. Edward State Park that is proposed to be transferred offers nothing new to the public. Adverse Possession laws could mandate that the public maintain its current level of use on this parcel.

#### HISTORIC AND CULTURAL RESOURCES

"The finding of human remains would be reported to the county coroner and local law enforcement."

Any Native American tribe/group affiliated with the site also needs to be notified, included, and have a voice in the consequence of such a find.

Address how the Native American tribes/groups affiliated with the site have specifically been involved in the process.

"The Seminary Building retains a large amount of historic material as apparent in the kitchen, dining halls, dorm rooms and science labs. In the event this material does not remain in place, it should be saved and reused within the Lodge at Saint Edward project to the extent feasible/appropriate."

Specify what will be done with the artifacts that are not saved/reused.

#### TRANSPORTATION

"The project would contribute to citywide transportation improvements through payment of traffic impact fees in accordance with the current City concurrency management program."

Specify how this project would contribute to immediate (not citywide) transportation improvements.

Specify what the effects will be on the adjacent Juanita Drive.

This traffic situation needs to be studied by a completely impartial consultant at various times of the day and various days of the week.

"The proposed on-site parking is expected to accommodate demand under most conditions for Alternatives 1 and 2. If occasional events are expected to exceed parking demand, then this could be accommodated by the use of valet parking to stack vehicles more tightly into the existing space."

The idea of going to a state park for a hike and checking one's car in and out through a valet service is preposterous.

The parking study by Heffron Transportation is flawed and should be disregarded. Another study by a completely impartial consultant needs to be conducted.

Provide details of mitigation measures that will ensure that the hotel/conference users will not use public parking.

There are already parking challenges at St. Edward State Park. With increased population, there will be more park users. Identify how parking will be served in the future – 5, 10, 20 years from now to accommodate the increased population.

More parking lots mean fewer trees and grass.

Identify at what point the area surrounding the building becomes mostly parking lot and less forest/field. Identify the "tipping point" in the balance.

The City of Kenmore Municipal Code Chapter 18.40 would require about 330 parking spaces for a project of this size. Daniels proposes 153.

Specify the plan for resolving this disparity.

If the plan is for the city to change the municipal code, this would be a blatant conflict of interest.

The 330 spaces mentioned above is for a hotel/conference center and does not encompass the day user. Identify the provision for parking for restaurant/spa users (not park users or hotel guests).

There is no convenient public transportation to/from the airport to St. Edward State Park. Address the transportation and environmental issues and impacts of hotel/conference users traveling to and from the airport.

Address the transportation and environmental issues and impacts of hotel/conference users traveling in and out of the park during their stay at the hotel. Specify the number of "round trips" each guest will generate and the cumulative effect of these trips, assuming an "at capacity" occupancy.

"The proponent would rehabilitate the existing Saint Edward Seminary Building for use as a lodge-type hotel..." Describe exactly what is meant by a "lodge-type hotel". Specify how this is different from any other hotel, and describe why referring to the project as a "lodge-type hotel" is important and/or significant.

"No changes are proposed to the gymnasium or the pool building. The gymnasium would continue to be utilized by Hummel Enterprises, which conducts youth basketball camps as part of 10-year lease agreement (five years are remaining on their lease with a five-year renewal option). Describe what might be done with the gymnasium at the end of the five-year lease if it is not renewed.

Explain why the gymnasium and pool buildings are included in the proposal.

In all categories, describe the cumulative effects of the hotel proposal with the ballfields proposal.

## RESPONSE TO LETTER 10

Finley, Phyllis

1. The comment regarding the Draft EIS public comment period and public information meeting is noted. Pursuant to WAC 197-11-455(6), the standard comment period for a Draft EIS document is 30 days.

As indicated in the Draft EIS, preparation of the EIS is the responsibility of the City of Kenmore as the SEPA Nominal Lead Agency, together with the Washington State Parks and Recreation Commission pursuant to WAC 197-11-942, WAC 197-11-944 and the Lead Agency Agreement between the City of Kenmore and Washington State Parks and Recreation Commission. In June 2016, the City of Kenmore and Washington State Parks and Recreation Commissions entered into a SEPA Lead Agency Agreement under WAC 197-11-944 that identified the City as the nominal Lead Agency, but provides that Washington State Parks and Recreation Commission is a co-lead to ensure that any environmental documents are adequate for decision-making needs of the Washington State Parks and Recreation Commissions as well.

Ecologists conducting fieldwork for the Lodge at Saint Edward Project were informed of the project area, the nature of the proposed project, and study boundary extent. Neither the applicant nor the City of Kenmore provided any substantive review of the findings. Wetland and stream studies were conducted following codified and accepted professional methodologies.

2. The No Action Alternative that is analyzed in the Draft EIS is consistent with direction from the Washington State Parks and Recreation Commission regarding the management of the Seminary Building. Appendix C of the Draft EIS includes details on the management direction outlined by the Commission which identified the rehabilitation of the Seminary Building through a partnership with a public or private entity as the preferred

management option. In the event that rehabilitation was determined to be unfeasible the preferred alternative management option was to vacate the building to reduce maintenance backlog and prevent the building from demolition without sacrificing recreational opportunities at the park. As part of vacating the Seminary Building, it is anticipated that fencing would be provided around the building to prevent vandalism and unauthorized access to the building.

3. The comment regarding the feasibility of mitigation measures is noted.

4. As defined by WAC 197-11-408 an EIS shall analyze the probable significant adverse impacts that could result from a project. Probable is defined by WAC 197-11-782 as likely or reasonably likely to occur and is used to distinguish likely impacts from those that merely have a possibility to occur, but are remote or speculative.

5. The scope of environmental elements to be included in the analysis of the EIS was determined as part of the EIS Scoping process for the project that was held from July 12, 2016 through August 2, 2016. Based on comments received during the scoping period, the City of Kenmore identified the following elements as those that would have probable significant adverse impacts and would be included in the EIS analysis: Earth (including critical areas – geologic hazards), Water Resources, Plants and Animals (including critical areas – wetlands and streams), Noise, Air Quality, Land Use, Recreation and Park Use, Light and Glare, Historic and Cultural Resources, Public Services, Utilities and Transportation.

6. The ball field renovation project that is proposed by the City of Kenmore is a separate project and is not part of the Lodge at Saint Edward Project. The ball field project is identified as a potential development project in the vicinity of the Lodge at Saint Edward Project site and is included as part of the indirect/cumulative impact analysis in the Draft EIS. As noted in Draft EIS Section 3.9 (Historic and Cultural Resources), project elements such as site landscaping would also be designed in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Preservation – Rehabilitation to minimize impacts to historic character elements.

7. An analysis of potential plant impacts that could result from development under the EIS Alternatives is included in Draft EIS Section 3.3 (Plants and Animals). The analysis incorporates by reference the Habitat Assessment Report and Tree Inventory and Arborist Report that were prepared for the project which identified specific trees and vegetation within the site area. These reports are on-file with the City of Kenmore and available on the City's website.

8. An analysis of potential impacts to animals that could result from development under the EIS Alternatives is included in Draft EIS Section 3.3 (Plants and Animals). The analysis incorporates by reference the Habitat Assessment Report that was prepared for the project, which identified wildlife and wildlife habitat within the site area -- including fish and wildlife species and habitats of local importance. These reports are on-file with the City of Kenmore and available on the City's website.

9. As noted in Draft EIS Section 3.2 (Water Resources), new impervious surfaces under the EIS Alternatives would require stormwater management features that would be designed to be consistent with the applicable requirements of the 2009 King County Surface Water Design Manual (KCSWDM), as adopted by the City of Kenmore. The preliminary stormwater management design for the project would be intended to provide flow control and water quality facilities. The stormwater management design would undergo full drainage review by the City of Kenmore as part of the site plan review process and building permit process to ensure compliance with the KCSWDM, as adopted by the City of Kenmore, including flow control and water quality requirements.

10. The comment regarding the 9.9-acre parcel that would be transferred to the Washington State Parks and Recreation Commission is noted. As indicated in Draft EIS Section 3.7 (Recreation and Open Space), park visitors currently utilize portions of the 9.9-acre parcel but are trespassing on private property.

11. Draft EIS Section 3.9 (Historic and Cultural Resources) includes a mitigation measure for the inadvertent discovery of archaeological resources on the site. In the event that archaeological deposits are inadvertently discovered, the City of Kenmore and Washington State Parks and Recreation Commission would be notified. The City of Kenmore and Washington State Parks and Recreation Commission would then notify DAHP, the King County Historic Preservation Program and interested Tribes.

The Muckleshoot Indian Tribe has been notified during the project process, including notification of the issuance and availability of the Draft EIS. No comments were received from local Tribes.

12. Under the Washington State Growth Management Act (GMA), “concurrency” is the requirement that adequate infrastructure be planned and financed to support the City’s adopted future land use plan. Level-of-service (LOS) standards are used to evaluate the transportation impacts of development growth. Traffic impact fees are one means that a City may apply to fund projects to address identified transportation impacts.

Concurrency requirements are addressed at the city and county level through development and implementation of Comprehensive Plans, which receive major updates every 7 to 10 years and minor updates annually. The City of Kenmore Comprehensive Plan received its most recent major update in June 2015. As part of this process, the City prepared long range forecasts (through year 2035) of the traffic generated by buildout of its adopted future land use plan, and identified citywide improvements needed to address transportation impacts. Traffic impact fees were calculated to determine the level to which new development should help fund future transportation improvements, in proportion to its contribution to the traffic growth that triggers the need for the improvements. Traffic impact fees are codified in Kenmore Municipal Code (KMC) 20.47.120, and have been established as part of the City’s Concurrency Management System (KMC 12.80).

The City completed a concurrency review of the proposed project and determined that it meets concurrency, meaning that the traffic it would generate is consistent with the future long-range growth assumptions that are covered by the City’s Concurrency Management Program. Therefore, the project’s payment of traffic impact fees would be its contribution to funding future transportation improvements in Kenmore, in proportion to the traffic it would generate. The City determines the priority for projects to be funded by all available revenue sources (including traffic impact fees) in its Capital Improvement Program, which lays out all projects to be implemented over the next six years, and is updated annually. The Capital Improvement Program is adopted annually by the City Council, and is subject to public review and input.

The Draft EIS transportation analysis also evaluated the effect of project-generated traffic on Juanita Drive NE at its intersection with NE 145<sup>th</sup> Street, where the project-generated trips on the citywide street system would be highest. As described in DEIS Section 3.12.2 Impacts, analysis was completed for the weekday morning and evening peak hours, when the traffic generated by the project combined with the traffic on the surrounding street system would be highest. The analysis assumed trips generated by a fully-occupied lodge during “with conference” conditions, and also took into account its cumulative traffic with trips generated by the Saint Edward State Park on a day with high recreational activity, the City’s proposed ballfields project, and Bastyr University. Background growth assumptions on Juanita Drive NE (accounting for future traffic growth resulting from other development) were consistent with the City’s future traffic demand forecasts described above. Together, these assumptions provide a conservative typical “worst case” condition that was analyzed, resulting in LOS C (average delay under 35 seconds per vehicle) conditions during both peak hours, as shown in Table 3.12-4 of the Draft EIS. This meets the City’s standard of LOS D for arterial intersections, which would allow average delay of up to 55 seconds per vehicle (described in more detail in Attachment A of the Transportation Technical Report, provided as Appendix H of the Draft EIS). Therefore, the DEIS transportation analysis concluded that no adverse traffic operational impact would result from the project, and no additional mitigation would be needed. Because the analysis assumed a typical worst case time of day and day of week, there was no need to evaluate other times of day or days of the week because they would have better operation than the periods evaluated.

The transportation analysis completed for the proposed project was impartial, following best practice procedures established by the Institute of Transportation Engineers (ITE) and consistent with the City of Kenmore's guidelines. The project analysis was coordinated closely with transportation reviewers at the City, including scoping of the transportation and parking analysis with the City staff prior to its initiation, and the analysis and report were reviewed by the City and Washington State Parks prior to its finalization for the Draft EIS.

13. Valet parking is identified in the DEIS as a mitigation measure that could be implemented by the proposed lodge—during occasions when larger events may generate additional parking demand—to accommodate more of the parking that it generates on site and prevent potential spillover to the parking at Saint Edward State Park. This measure is recommended only for the proposed lodge and would not apply to Park users. Please refer also to the response to Comment 12 of this letter.

14. The project would have responsibility for accommodating the additional parking demand that it would generate without adversely impacting the parking for Saint Edward State Park. Please see the response to Comment 12. It is acknowledged that the proposed lodge would not be able prohibit guests from parking in the Saint Edward State Park public parking spaces if they should choose to pay, but the following elements would provide a cost and convenience incentive for guests to use parking provided by the lodge, and disincentive for guests to use parking provided for the Park:

- The charge for on-site parking would be built into room rates and event fees, while parking at the State Park public parking areas would require an additional paid Discover Pass.
- On-site parking would be closer to the lodge, with much of it covered, and thus would be more convenient for guests than parking at the State Park public parking areas.
- In a circumstance where the lodge may need to use valet parking to accommodate more vehicles on-site, it would still be more convenient for guests to come and go from an on-site valet station than to park at the State Park public parking areas, with no additional parking charge when they are on-site.
- In a circumstance where the lodge may need to shuttle guests to/from off-site parking to accommodate occasional larger events, the cost would be built into overall event costs and there would be no additional charge to guests when they are on-site. Additionally, since larger events typically are planned several months in advance and include invitations or other forms of notification, parking instruction to event participants, indicating how/where they should park and asking that they not use the State Park's public parking, can be provided.

While the proposed project would be responsible for accommodating the parking it generates and not adversely affecting general parking for surrounding uses including Saint Edward State Park, the lodge would not be responsible for providing spaces to accommodate additional Park-generated parking demand that is unrelated to the proposal. The appropriate amount of public parking supply for Saint Edward State Park is determined by Washington State Parks, based upon the balance the agency identifies between the parking demand that should be met and maintaining the desired overall character of the Park.

As described in the Alternative 1 – Proposed Action/Traffic Volumes subsection of DEIS Section 3.12 (Transportation), the hotel use, on which both the trip generation and parking rates are based, includes a mix of associated uses in addition to sleeping accommodations. The ITE "Hotel" land use category (Land Use Code 310) defines hotels as "places of lodging that provide sleeping accommodations and supporting facilities such as restaurants, cocktail lounges, meeting and banquet rooms or other convention facilities, limited recreational facilities, and/or other retail and service shops." Because the proposed project's spa would be a small facility and intended to serve hotel guests, it is also considered with the ancillary facilities that are included in the overall hotel trip and parking rates. The Cedarbrook Lodge, with rates presented in the DEIS based upon driveway counts for "with conference" conditions, included a mix of sleeping accommodations, meeting rooms, a fitness center, and on-site restaurant, similar to the proposed project. As described in the DEIS, while occupied rooms is the unit of measure, it is a proxy for the overall facility size. Trip rates are based upon driveway counts that were conducted at a similar facility when a conference was occurring, and include trips generated by

conference participants, restaurant visitors, employees and hotel guests.

By the definition described above, and by which the traffic and parking analysis was based, the proposed project is a hotel, not a conference center, and the proposed parking supply meets the City's code requirements for a hotel.

15. The trip estimates provided in Draft EIS Table 3.12-3, and subsequent DEIS transportation analysis evaluating those trips, reflect round trips forecast to be generated by the project (with each round trip counted as two trips, one inbound and one outbound), with the hotel fully occupied and "with conference" conditions. The estimates include total daily trips, as well as trips expected during both the AM and PM peak hours. As described in the Alternative 1 – Proposed Action/Transit and Non-Motorized Transportation subsection of DEIS Section 3.12 (Transportation), all trips generated by the project were assumed to occur by vehicle.

It is recognized that the site does not have convenient access to SeaTac Airport. As such, it is not likely to be booked for events with a large percentage of out of town guests. Those who do require airport connections could use taxis, shuttles or ridesharing services (e.g., Uber). The additional trips associated with airport transportation (where one part of the round trip is made without a passenger) are inherent in the trip generation rates used for the traffic analysis.

16. A lodge hotel would be similar in style to a park lodge found at places such as Yellowstone National Park or the Paradise Lodge at Mount Rainier National Park. There are no immediate plans for the status of the gymnasium building beyond the existing five year lease agreement with Hummel Enterprises.

17. The Draft EIS includes an analysis of potential indirect/cumulative impacts from the Lodge at Saint Edward Project and other development projects in the site vicinity (including the ball field renovation project) for each environmental element.

From: lichen@sprynet.com [mailto:lichen@sprynet.com]

Sent: Thursday, November 17, 2016 12:27 AM

To: Permit Tech <permittech@kenmorewa.gov>

Subject: Comments for City of Kenmore Notice of Draft EIS for the Lodge at Saint Edward, CSP16-0077

Please let me know you received this. Thank you!

Attention: Eilean Davis, Senior Planner

Dear Eilean,

I am a park user who travels from Kirkland to visit Saint Edward State Park with great frequency of at least 2x/week for the last 18 years. The following are comments which I believe should be addressed in the Final EIS:

Saint Edward State Park is the home of deer, coyotes, eagles, owls, woodpeckers, hummingbirds, bats, squirrels, rodents, garter snakes and numerous other species of wildlife. I have seen many of these animals while walking in the park. The State Park is a refuge for them. Some are not mentioned in the DEIS. They have little habitat remaining as the Kenmore area and Eastside are rapidly developed.

Most of the categories of the Draft Environmental Impact of Proposed Action for the Lodge at Saint Edward listed in Alternatives 1 and 2 contain action that will adversely affect wildlife in Saint Edward State Park. Because wildlife has no voice, I submit the following comments:

I see the detrimental effects to wildlife of construction and post-construction noise, light, vibration, air and water pollution, tree and vegetation removal, soil disruption and removal, pavement placement, increased litter and trail usage by staff and guests.

Throughout the DEIS, there are phrases such as "no importance", "should not have a significant impact", "impacts ... would be minimal", and "no impacts". Combined, all of these "minimal" impacts would combine to be a significant impact. Valid concerns are raised about impacts to wildlife, only to be immediately downplayed, discounted or minimized by "mitigation measures". Ultimately, the report looks "green-washed".

Messages of artificial lighting, landscape plants and garbage from the hotel being beneficial to wildlife (3.3-8) does not mitigate the side effects from these same attractants

There is also the downplaying of effects on wildlife by saying noise and light are common in urban habitats (3.3-10) and that species there are "expected to be somewhat tolerant of disturbances that are common in urban settings". Especially the cumulative effect of both, the hotel and ball fields, would be an excessive amount of impacts for wildlife to adapt to. Please see my comments regarding the DEIS of the ball field sent to Andrew Bauer on 9/29/16.

Even without taking into account the potential future existence of hotel or ball field expansion, our region's rapid growth will bring more and more people to Saint Edward State Park for passive recreation. This will be enough strain on wildlife, without exacerbating the effect with new development.

Even the purchase of the 9.9-acre parcel will not act as adequate mitigation for the effects on wildlife because the same number of animals are in the parcel and affected park area with a net gain in noise, light and disruption to that same number of animals.

The summary statement in 3.3.4 Significant Unavoidable Adverse Impacts of there being "no significant adverse impacts to wetland resources, plants or animals are anticipated" is highly unsupported.

Per the layout of the DEIS, here are specific comments:

### 3.2 Water Resources

Storm water run-off containing vehicle and equipment leakage, herbicide use, and any other chemicals/solvents will affect any creature in its path.

### 3.3 Wetlands, Plants and Animals

The project may not directly connect to wetlands, but stating there are “no direct impacts” to wildlife is false. Lighting, vibration, exhaust and other air pollutants are all direct impacts to wildlife.

Laying pavement, especially asphalt, will contaminate soil, block insects, take away soil access and green vegetation for birds and deer to feed from. Both have been seen in the park, some eating from the vegetation and ground.

Vibration would affect ground nesters, ground/soil dwellers.

There is the mention of removal of 10 measured trees, adjacent unmeasured trees and additional trees for parking areas. Trees and other vegetation are homes to birds, squirrels and insects, some of whom will still be in the trees if and when they are removed. Yet, it is stated that “Overall, impacts to plants under the Proposed Action would be minimal.”

According to the DEIS 3.3-8, bald eagles are still protected under the Migratory Bird Treaty Act, Lacey Act and Bald and Golden Eagle Protection Act. While the report says that no bald eagle nests or eagles were detected during the site visit, a bald eagle’s nest has been spotted on the North Ridge Trail and eagles have been seen this summer from the beach at the park picking up fish in Lake Washington landing on trees inside the park.

Litter would increase on the trails and in the forest from hotel guests and staff.

Numbers of people on the trails would increase dramatically with guests and staff, some at night. Currently, there is no trail use at night.

### 3.4 Noise

Noise travels a great distance and will affect any wildlife in earshot, especially species with sensitive hearing. Noise that does not exist at night in the present setting, will now exist and be constant. There will be the noise of cars, HVAC and other building operations, voices and human activity.

The mitigation suggestions found in the document contain a lot of “could” and no mitigation measures actually required. I question how it would be monitored and enforced. If its anything like the usual construction scenarios, monitoring would be weak and enforcement would be inadequate. Statements that, with mitigation measures, “significant unavoidable noise impacts are not anticipated” and “operation noise is not anticipated to be significant” are not believable without valid justification.

Also questionable is that “minor increases in traffic noise would occur in Alternative 1, but this increase would not result in noise impacts”. This statement seems vague. Needed are definitions of “minor” and “noise impacts”.

Let’s not forget that the park is currently open for use only during daylight hours, leaving wildlife to quiet time at dark. With the hotel, guests and staff who decide to use the trails, drive in and out of the park, or even speak loudly at night would be disturbing wildlife.

### 3.5 Air Quality

Construction phase is 14-16 months (minimum) of air pollution. While climate change is paramount, it is not the only factor to consider as a defense for worsening air quality in the local wildlife environment.

### 3.6 Land Use

Dust/emissions/leakage of oil/solvents/lubricants from machinery, increased noise and vibration and increased traffic will be detrimental to wildlife.

### 3.7 Recreation and Open Spaces

Construction causing limited or no access to park trails and areas, while temporary, is unacceptable as the public deserves access to all trails during opening hours with the exception of maintenance by Parks for the park itself, and not for the construction of a private structure.

The statement “Operation of the lodge-type hotel would result in additional visitors to the park and increased use of recreational amenities. However, the increase would not be significant due to the already high visitation rates and the large overall size of the park, which would increase with the addition of the northwest adjacent parcel.” Is inaccurate. Those who frequent the park would know that most park users, ignorant of the private land they are currently entering when walking the North Ridge Trail, are already using the trail on the McDonald Property. Therefore, as it stands now, the purchase of the McDonald property would not, in reality, dilute the addition of visiting park users from hotel staff and guests. New trails constructed on the McDonald property would be suboptimal due to steep slope of the property and further impact to the wildlife that resides there, currently minimally affected by park users.

### 3.8 Light and Glare

“Operation of the lodge-type hotel would increase the amount of lighting on the site from mobile and stationary sources, particularly during evening hours and could result in light spillage to adjacent areas of the park.”

Light pollution negatively affects nocturnal and non-nocturnal animals, fooling them into thinking that night is day. As mentioned in the DEIS, it causes “increased orientation or disorientation”, “could affect foraging, reproduction, communication or other behaviors” (3.3- 12). Lighting used during and after construction will disrupt their lives significantly.

Reference: “Light Pollution—the Reversible Scourge on our Night Sky” article written by Mary Coolidge, BirdSafe Portland Campaign Coordinator, in the Audubon Society of Portland Warbler, September/October 2016, Volume 80, Numbers 9 & 10.

### 3.10 Public Services

At the proposed lodge, police service is estimated. Doing the math, it averages out to be about every other day. Fire/emergency services would average to be about every 3rd day, a tremendous change from the current state. Noise and vehicular traffic from this, including large fire trucks will affect wildlife.

### 3.12 Transportation

890 vehicle trips per day, especially if they occurred in a 16-hour period when people are awake, would average to a car every minute. That is quite the significant increase in exhaust, vibration and noise.

Regarding the existing access road for emergency access requirements, it is unclear what type of monitoring of the access road to ensure it “remains accessible at all time” would be provided. More importantly, any widening of the road or paths or removal of trees and paving would not only negatively affect wildlife, but also drastically diminish the historical landscape of the entry road and adjacent forest. The existing tree-lined road to the park is the beginning of the special park experience of Saint Edward State Park.

Improvements to the existing path from Juanita Drive NE would most certainly be pavement to meet ADA requirements. Paving, especially with asphalt, would directly contaminate the dirt trails and affect wildlife.

Thank you for reading my letter. I look forward to a Final EIS that addresses these concerns.  
Sincerely,  
Tracy Hendershott  
Kirkland, WA

## RESPONSE TO LETTER 12

Hendershott, Tracy

1. Draft EIS Section 3.3 (Wetlands and Plants/Animals) includes an analysis of potential plant and animal impacts, including potential impacts associated with construction activities, increased noise and increased light that would be generated by development under the EIS Alternatives.

The analysis also incorporates by reference the Habitat Assessment Report that was prepared for the project, which identified wildlife and wildlife habitat within the site area -- including fish and wildlife species and habitats of local importance. These reports are onfile with the City of Kenmore and available on the City's website.

2. Comment noted. Mitigation measures identified in the Draft EIS are intended to minimize potential impacts that are anticipated with development under the EIS Alternatives.

3. The statements referenced in this comment from Draft EIS Section 3.3 (Wetlands and Plants/Animals) are general descriptions of urban-adaptor behaviors documented in the literature. These are not mitigation measures. Mitigation measures are summarized in Draft EIS Section 3.3.3 – Mitigation Measures. As stated on Draft EIS page 3.3-13, mitigation measures include directing light away from natural areas and providing trash receptacles to reduce the potential for littering.

4. Wildlife species present in the already developed project area are expected to be adapted to the noise and light disturbance that presently exists at the seminary site and nearby ballfields. As stated on page 3.4-8 of the DEIS, the cumulative effect of proposed changes to traffic noise would be an increase by "approximately 1 dBA, an acoustically negligible increase." The proposed increase in light and noise associated with the ballfields was acknowledged; the additional disturbance associated with the ballfields will be concentrated in the period between 3 and 9 PM. Mitigation measures to control and limit disturbance to wildlife are also included in Draft EIS Section 3.3.

5. Comment noted. The acquisition and transfer of the 9.9-acre McDonald Property to the Washington State Parks and Recreation Commission would add additional vegetated and forested area to the existing Saint Edward State Park. It is possible that the 9.9 acre property could be developed for single family residential use, in accordance with City of Kenmore regulations. The acquisition and transfer of the property to the Washington State Parks and Recreation Commission would allow the Commission to manage this property as part of Saint Edward State Park and maintain the existing primarily vegetated and forested area for park use and plant/wildlife habitat.

6. New impervious surfaces under the EIS Alternatives would require stormwater management features that would be designed to be consistent with the applicable requirements of the 2009 King County Surface Water Design Manual (KCSWDM), as adopted by the City of Kenmore. The preliminary stormwater management design for the Lodge at Saint Edward Section III Final Environmental Impact Statement Draft EIS Comments and Responses project would be intended to provide flow control and water quality facilities. The stormwater management design would undergo full drainage review by the City of Kenmore as part of the site plan review process and building permit process to ensure compliance with the KCSWDM, as adopted by the City of Kenmore, including flow control and water quality requirements.

7. As stated in Draft EIS Section 3.3 (Wetlands and Plants/Animals), temporary construction activities would generate noise, light and vibration that could temporarily disturb wildlife in close proximity to construction areas, while operational noise, traffic and light could affect the wildlife community composition immediately adjacent to the site area. Potential mitigation measures for noise, traffic and lighting effects on wildlife are identified in Draft EIS Section 3.3 to minimize the potential effects on wildlife.

8. Comment noted. The removal of trees is noted as part of the development under the EIS Alternatives and is included in Draft EIS Section 3.3 (Wetlands and Plants/Animals).

9. One bald eagle nest is mapped by WDFW in Saint Edward State Park, approximately one-quarter mile outside of the project area. While no bald eagles or nests were encountered within the study area during fieldwork, their presence is documented within the park (The Watershed Company, September 2016). For reference, the habitat assessment study area extends approximately 900 feet beyond the lease area. Bald eagles are likely to utilize forested patches within the park, particularly near water, for perching. This habitat will not be altered by the proposed site improvements.
10. Comment noted. Draft EIS Section 3.7 (Recreation and Open Space) identifies the potential increase in park and trail usage that would be generated by the Lodge at Saint Edward Project.
11. The noise analysis in Draft EIS Section 3.4 (Noise) relies upon Washington State Noise Standards. Temporary noise impacts would occur during construction and would be limited to construction hours. The projected increase in traffic noise is determined to be negligible. Operational noise impacts are anticipated to be within allowable limits, although operational noises at night do represent a change from existing conditions. Noises generated from guests speaking loudly or driving in and out of the project area are expected to be limited to the areas immediately adjacent to the facilities and dampened in the interior forest habitats by the forested vegetation.
12. Comment noted. Air quality impacts associated with construction and operation of the Lodge at Saint Edward Project are identified in Draft EIS Section 3.5 (Air Quality and GHG Emissions).
13. Potential impacts to wildlife were analyzed in Draft EIS Section 3.3 (Wetlands and Plants/Animals).
14. Draft EIS Section 3.7 (Recreation and Open Space) identifies the potential temporary construction impacts to some trail areas and parking lots, including modified access to certain trail areas adjacent to the site and temporary closure of existing parking lots within the site area during construction. As noted in the Draft EIS, these impacts would be temporary in nature and other trails and parking lots within the park would remain available.
15. As noted in Draft EIS Section 3.6 (Land Use) and Section 3.7 (Recreation and Open Space), existing park users that utilize the 9.9-acre McDonald Property are currently trespassing on private property. The acquisition and transfer of the property to the Washington State Parks and Recreation Commission would allow the Commission to manage the property as part of Saint Edward State Park and maintain the existing primarily vegetated and forested area for park use and plant/wildlife habitat.
16. Lighting is identified in the Draft EIS as an indirect cumulative impact of this project. Mitigation measures presented in Draft EIS Section 3.3 (Wetlands and Plants/Animals), such as directing lights away from natural areas, can reduce this impact.
17. As noted in Draft EIS Section 3.10 (Public Services), the analysis of demand for police service and fire/emergency services reflects a conservative analysis for full maximum occupancy at all times. It is anticipated that the building would not be at full maximum occupancy during all operating hours and the estimated number of annual calls for service would likely be lower. Potential noise impacts to wildlife are analyzed as part of Draft EIS Section 3.3 (Wetlands and Plants/Animals).
18. It is acknowledged that the Draft EIS transportation analysis forecasts 890 daily trips, for conditions with a 100-room hotel at full occupancy, and "with conference" conditions, which equates to an average of about 1 additional vehicle per minute over 16 hours. Based upon the peak hour volumes presented on Figure 3.12-2 in the Draft EIS, the project-generated traffic is expected to make up about 12-13% of total traffic on NE 145th Street and 2-4% of total traffic on Juanita Drive NE nearest the site. While it is expected that the increase could be noticeable to observers of NE 145th Street, the transportation analysis presented in the Alternative 1 – Proposed Action/Traffic Operations subsection of Draft EIS Section 3.12 (Transportation) shows that traffic operations at Juanita Drive NE/NE 145th Street, where project-generated traffic would be highest, would be well within the City's adopted traffic operations standard. It is noted that the analysis condition reflects a high hotel occupancy with an event and is not expected to occur every day. Please see also the response to Letter 10 – Comment 12.
19. Under the EIS Alternatives, widening of the existing park access roadway (NE 145<sup>th</sup> Street) is not anticipated as part of the Lodge at Saint Edward Project.
20. Comment noted.

From: Rebecca Hirt  
To: Permit Tech; Bryan Hampson  
Subject: Draft E.I.S. City file: CSP16-0077  
Date: Friday, November 18, 2016 5:01:30 PM  
Attachments: 2016 08 05 Citizens for St. Edward State park -- DEIS Scoping Comments.pdf  
Attn: Eileen Davis

Please send this to the appropriate people. Thank you.

Dear Bryan Hampson and others who receive this,

There are a number of things I have to comment on about this process and material in the Draft EIS for the Lodge at Saint Edward.

1) It would have been a courtesy to have received a response instead of the current nonresponse to my request on behalf of Citizens of Saint Edward State Park for a 30 day extension for comments. I find it very discouraging that City of Kenmore is ignoring a request from the public for time to review and study the material contained in a very long document. The token four days added did not give adequate time when the State Parks and Recreation Commission was also meeting this week. Some individuals found themselves pressed to attend that meeting in Yakima and also meet this deadline. The City of Kenmore should be more considerate of its citizens' desire to work with it and give accurate, intelligent feedback to the Draft EIS.

2) Throughout the document mitigation is addresses as something can or could be done. This is very vague with no direction of what should be done to mitigate an environmental impact. Therefore, I am left to wonder if anything will be done. These comments need to be clarified and there be clear direction on the required action for mitigation.

3) Page 1-13: Measures to control and limit disturbances to wetlands, plants and animals.

a) How will limiting intrusions to only well-maintained, established trails be accomplished? Who will monitor this to keep people from going off trail that results in a web to spur trails?

b) Fencing between high-value habitat and developed areas to discourage intrusions is not in keeping with nature and the natural environment of the park.

c) Clearly posted speed limits without enforcement will not prevent traffic incidents with wildlife. Who will enforce the speed limit?

Throughout the document construction is stated to be 14-16 months. Limiting or avoiding contraction for six months (February-July) will impact this schedule. How will this constraint be implemented to assure minimizing disturbance to breeding birds?

4) Pg 1-14: Alternative potential mitigation. Replacing lawn with native vegetation will alter the Great Lawn that is listed on the National Historical Record.

5) Pg 1-15: Operational noise is to be mitigated by measure identified above. These are not spelled out, only construction noise mitigation is detailed – all say "can or could" so no teeth to these measures

6) Pg 1-16: Air Quality: Using sustainable features and green building technologies is only a consideration. This should be emphasized more and be a goal providing a renovation using "best practices" of construction. Also, again mitigation measures only address construction not emissions from operations as claimed.

7) Pg 1-17: Land Use Significant Unavoidable Adverse Impacts: " Project will introduce a type of land use not currently present within Saint Edward State Park and activities no currently typical of existing park uses." Mitigations mentioned will NOT avoid the damage caused by changing the overall character of the park. The project might be consistent with Kenmore's Comprehensive Plan that was updated in 2015 to accommodate this project but it is NOT in keeping with the Saint Edward State Park Management Plan that is the guide for management of the park. It contradicts the policies adopted by the State Parks and Recreation Commission in a number of ways:

a) "The introduction of new uses into the Seminary Building is not needed to further the primary purpose of the Park as a place for outdoor recreation and enjoyment of nature.....Therefore, any use of the Seminary Building must be:

a) subordinate and complementary to the primary attraction and use of the park as a natural sanctuary and place of outdoor recreation and b) secondary to and compatible with outdoor recreation as specified in the Land and Water Conservation Fund deed limitation, rules and policies."

b) "Priority should be given to uses of the Seminary Building which support outdoor recreation and traditional park

activities. (Project does not support outdoor recreation and traditional park activities but brings in new activities that are not in keeping with the history of the building.)

c) "Certain portions of the building are of particular value for public use, including the main floor containing the grand dining hall, the former faculty lounge and classrooms, the second floor library and sanctuary beneath the dining hall (Preferred Public Areas). Preference should be given to uses which make the Preferred Public Areas available for public use. (This project will limit public access to these areas by allowing only paying customers/guests see them.)

d) "Use of the building should not materially limit or distract from current and future outdoor uses of the grounds, trails and ballfield....." (Permanent displacement of the volleyball court that is on the National Historic Register is a loss of recreation, materially limiting its use and purpose.)

e) "Use of the Seminary Building should not result in alteration of the seminary grounds, except for improvements necessary to meet ASA, fire and building code requirements" (Again the permanent displacement of the volleyball court alters the grounds, as does parking near the historical Nun's Garden.)

f) " Seek to retain majority of the building available for public use for a reasonable use fee..... (I do not see this type of hotel/conference center being available for a fee that is reasonable for the majority of the public. The targeted users are those with an income in the top 5 to 25%.)

8) Pg 1-17: The 9.9 acre property adjacent to the Park is touted throughout the document as a mitigation for the changes in character and access to passive outdoor recreation in the greatly used Core of the Park, the flat area where the seminary building sits. Sometimes it refers to trails and other times to one trail. There is no recognition of the steep slope that has prevented development of this property, the reason it is still available. As pointed out by Ann Agaard on November 10, this land does not provide comparable outdoor recreation opportunities to park users who are elderly, handicapped in some way or even families with young children who cannot navigate the steep slope. A large hotel/conference center can be intimidating to some park users who are limited to using the Core of the Park for recreation. The most possible scenario is that it will be used by park users who currently walk/hike the existing trails in the steep slope areas of the Park. The steep slope needs to be recognized and the public given the slope percent as stated for other areas of the Park.

9) Pg 1-18: Clarification of how specific lighting will be done. Keeping the Park open at night will definitely have a Light and Glare impact on the wildlife that lives in the Park. Even minimum light spillage is more than lighting that is currently in the Park. Pg. 3.8-2 on operational impacts states "lighting design is intended...." This is weak and does not state that it will be done. Need to define what measure will be met and how. Regardless of what is done, there light and glare will be greater than what occurs now so there will be significant impacts in the areas around the building and ballfields.

10) Pg 1-19: How will the public know if the project does not meet the Secretary of the Interior's Standards for the Treatment of Historic Places and triggers a HABS recordation? This is a new term for most people. Please clarify.

11) Pg 1-20: Water conservation: Strengthen Alternative mitigation to require water conservation material. Work with NUD to conserve water.

12) Pg 1-21: Use of wordage: "Could" for valet parking. Change to "Should". The traffic and parking study does NOT account for the high use of the Park from April – October. Studies have overlooked that currently park users often have to circle to find parking and sometimes have to leave. Even with the proposed parking garage, parking will be tight. An event, like a daytime wedding can result in residents who want to use the park playground, picnic area, trails, etc. not being able to access the those areas. Automobiles is the only way for 90% of the public to access the Park. A contract with Bastyr for overflow parking should be discussed now, not after the building has been renovated.

Operational impacts: 100 rooms with single occupancy in most has the potential to result in 100-150 hotel guests at any time. A large conference or event could result in 300-500 attendees. At capacity the restaurant is 240 people. This will definitely impact the Park by changing the character and purpose of the Park. It was purchased for PASSIVE OUTDOOR RECREATION, as described in deeds. Be honest that the pattern of activity will change from typical passive outdoor recreation to commercial use. The quiet sanctuary that many park users desire will definitely be

impacted. That is NOT addressed.

The DEIS consistently uses smaller numbers for the proposed activities to lessen the environmental impact. If those assumptions are used, the hotel/conference center will not be financially feasible. Realistic numbers about traffic and parking (not compared to Cedarbrook that is close to the airport) need to be done. The traffic section of the document is very poorly written. Charts the reader is referred to do not contain the information that is discussed. It needs to be corrected and realistic. Interesting that lodge with 100 rooms projected trips are 890, but only 150 of those are at peak morning and evening hours. That leaves 740 trip mid-day. I question these numbers as being a true representation of projected vehicle trips.

There is often the claim that there will be no net loss of parking for park users. However, the amount of parking stalls is mentioned is about 128. Currently, there are 220 parking places. This needs to be clarified. If net parking is to be 128, there is a great loss of parking for regular park users. Confirm what you mean by "no net loss of parking." Give current numbers and the total that will be available when this project is completed.

There are many other things I noticed, however, computer problems and recovering from surgery has prevented me from being able to address them and submit this on time. I reserve the right to mention these in the future, especially with the short time frame the public had to respond to a complicated project with a lot of environmental impact features.

I have attached the Scoping letter prepared by Bryan Telegin, Attorney, for Citizens for Saint Edward State Park. The points in the scoping letter apply equally to the DEIS. The argument made about this being a public project, not a private project, and therefore the city should not defer to Daniels Real Estate on the alternatives or the project's goals is even stronger now that I have read the Draft EIS.

Bryan, another fact you may not know. Getting the building and the park on the National Historic Register was not done by State Parks or City of Kenmore. It was done through the efforts of members of Citizens for Saint Edward State Park. The lead researcher and author of the application was Ann Hurst. We were told by State Parks that the deadline to submit an application was too close and it could not be done. Our great concern for the Park made this possible just as comments you receive are doing now.

Yours very truly,  
Rebecca Hirt  
Rebecca Hirt MBA  
rdhirt@earthlink.net  
425-823-6089

## RESPONSE TO LETTER 16

Hirt, Rebecca – Comment 2

1. Comment noted.
2. The Draft EIS identifies mitigation measures that would be required/proposed as part of the Lodge at Saint Edward Project. In some instances, the Draft EIS also identifies Alternative Potential Mitigation Measures that could also be implemented as part of the project.
3. Mitigation measures, including those to control and limit construction disturbances to wetlands, plants and animals, would be implemented and enforced as conditions of the project as part of the City of Kenmore's site plan review process and building permit process.
4. The Great Lawn is not located within the boundaries of the project area. Lawn/grass areas referenced by this mitigation measure on Draft EIS pg 1-14 and Section 3.3 (Wetlands and Plants/Animals) include grass areas immediately adjacent to the buildings and parking areas within the project boundaries as identified in Figure 2-3.
5. The Draft EIS does not identify significant operational noise impacts under the EIS Alternatives. As noted in the mitigation measures, the operation of the Lodge at Saint Edward Project would comply with applicable City of Kenmore noise requirements (KMC 8.05) and applicable Washington State Noise Standards (WAC 173.60).

6. The comment regarding sustainable features is noted. The Draft EIS does not identify significant operational air quality impacts under the EIS Alternatives.

7. The comment regarding the Saint Edward State Park Management Plan is noted. The Washington State Parks and Recreation Commission considers many factors when making decisions related to State Parks, including the cited Management Plan. The Seminary is classified in the "Recreation" zone, which allows for the proposed use. As indicated in Chapter 2 of the Draft EIS, "In September 2014, the Washington State Parks and Recreation Commission considered a range of management options for the Seminary Building, ranging from rehabilitation to demolition of the building. A SEPA checklist was prepared and a non-project Determination of Non-significance was issued related to the Commission's consideration of the management options. The poor condition of the building and subsequent cost to stabilize and rehabilitate the building was discussed. The Commission directed staff to "explore rehabilitation as the preferred management option for the Seminary Building, ensuring that proposals brought before the Commission include sufficient details and merit to reasonably assure prospects for success. If, at the conclusion of 12 months of exploration, the Director determines there is no reasonable proposal for rehabilitating the Seminary Building, then the building will be vacated." In September 2015, the Commission approved a one-year extension of their prior management direction to allow for a potential rehabilitation proposal to be brought to the Commission for consideration. At their September 22, 2016 meeting, the Commission approved another extension to allow for a potential rehabilitation and lease proposal to be submitted to the Commission."

Please also refer to Section 3.6 (Land Use/Relationship to Plans and Policies) of the Draft EIS for discussion regarding the Land and Water Conservation Fund.

8. The comment regarding slopes and accessibility of the 9.9-acre McDonald Property are noted. The acquisition and transfer of the property to the Washington State Parks and Recreation Commission would remove the potential for single family residential development of the McDonald Property, which could occur consistent with City of Kenmore regulations. The transfer of this property would allow the Commission to manage the property as part of Saint Edward State Park and maintain the existing primarily vegetated and forested area for park use and plant/wildlife habitat.

9. Operational light and glare impacts on wildlife are identified in Draft EIS Section 3.3 (Wetlands and Plants/Animals). As stated in Draft EIS Section 3.8 (Light and Glare), lighting design for the Lodge at Saint Edward Project would be consistent with City of Kenmore requirements (KMC 18.30.070), which includes requirements that exterior lighting be shielded or recessed so that direct glare and reflections are contained within the project area and directed downward and away from adjoining properties, streets and public walkways. Lighting shall also not be of unusual high intensity or brightness.

10. Determination on whether the project meets the Secretary of the Interior's Standards for the Treatment of Historic Properties for Rehabilitation would be made as part of the site plan review and building permit process, once specific plans for the rehabilitation are completed.

11. The comment regarding water conservation is noted.

12. The purpose of an EIS is to disclose the potential impacts of a proposed project and to identify mitigation measures that could address those impacts, both for transparency to the public and as a decision-making tool for agencies with jurisdiction. The use of the word "could" is appropriate for these purposes, particularly when more than one viable measure is identified. Conditions for approval, which can potentially convert a "could" to a "should," would be determined by the City and State as part of project approval process.

As described in the Traffic Volumes subsection of Draft EIS Section 3.12

(Transportation), the evening traffic counts upon which the transportation analysis is based were conducted in May, on a day with good weather and with evening youth baseball practices and a baseball game occurring at the Bastyr ballfields; future conditions analysis also added trips that would be generated by the City's proposed ballfields project. Therefore, the traffic analysis reflects cumulative conditions with a high amount of recreational usage.

The project would have responsibility to accommodate the additional parking demand that it would generate without adversely impacting the parking for Saint Edward State Park. Please see the responses to Letter 1 - Comment 2 and Letter 10 - Comment 14.

13. The comment regarding the impact associated with introducing commercial use to the Park is noted. As

indicated in Section 3.6 (Land Use) of the Draft EIS “development of the proposed Lodge at Saint Edward Project would introduce a type of land use not currently present within Saint Edward State Park and would introduce a pattern of activity not currently typical of the existing park uses. The proposed project would be consistent with the applicable provisions of the City of Kenmore Comprehensive Plan and the City of Kenmore Development Code. With the implementation of the required/proposed mitigation measures listed above, no significant unavoidable adverse land use impacts would be anticipated.” The hotel use, on which both the traffic trip generation and parking rates are based, includes a mix of associated uses in addition to sleep accommodations. Please also refer to the response to Letter 10 - Comment 14.

14. The transportation analysis completed for the proposed project followed best practice procedures established by the Institute of Transportation Engineers (ITE) and is consistent with the City of Kenmore’s guidelines. The ITE trip generation rates are based upon observations of over 200 hotels nationwide, primarily in suburban locations; these rates were corroborated with observed local data collected at the Cedarbrook Lodge, which is similar in size and mix of on-site uses to the proposed project. As described in the Alternative 1 – Proposed Action/Traffic Volumes subsection of DEIS Section 3.12.2 Impacts, the proximity of Cedarbrook Lodge to Seatac Airport likely results in higher use of taxis and shuttle, which translates to a higher number of vehicle trips. Therefore, application of the trip rate derived from Cedarbrook counts, which was used in the DEIS transportation analysis for PM peak hour conditions (the most congested hour of the day), likely results in a conservatively higher estimate of trips. In addition, a number of other assumptions were applied to provide a conservative typical “worst case” condition that was analyzed, and is further described in the response to Letter 10-Comment 12.

15. The Parking subsection of Draft EIS Section 3.12 (Transportation) identifies 220 spaces for the Park, which could be increased to 239 spaces with the City’s proposed ballfields project (as described in the City’s report provided in Draft EIS Appendix I). As described in Draft EIS Section 2.2 Project Overview, the Lodge at Saint Edward Project proposes to improve existing surface parking areas for Saint Edward State Park, and replace any existing parking spaces that would be displaced by the project, resulting in no net loss of parking for Park users. The 128 spaces described in that section refer to the number of spaces that would be improved or replaced to result in no net loss to the larger total.

16. The comment regarding EIS scoping comments on the project are noted and were considered in determining the final scope of the EIS. The Draft EIS includes an analysis of transportation, noise, light and glare, wetlands and plants/animals, recreation, land use and indirect/cumulative impacts. The Draft EIS also includes determinations from the Washington State Parks and Recreation Commission regarding findings on the viability of public or nonprofit uses as required by Engrossed Second Substitute House Bill 2667 as part of Draft EIS Appendix C and Appendix D.

17. The comment regarding the listing of the Saint Edward Seminary in the National Register of Historic Places is noted.

From: Greg Slayden To: Permit Tech Subject: Saint Edward Lodge Proposal EIS Comments Date: Friday, November 18, 2016 4:17:53 PM Attn: Eilean Davis, City of Kenmore Hi, Eilean, I had a few comments on the Draft Environmental Impact Statement for the Lodge at Saint Edward State Park, as follows: Page 3.6-12: I believe that this statement is misleading: "The addition of the 9.9-acre {McDonald Property} adjacent to Saint Edward State Park for public use would also provide additional trails and increased access to the Lake Washington shoreline for public use." There is similar Since the creation of the park in 1977, the McDonald property has been a de-facto part of the park and 99% of park visitors who hike the North Trail are unaware that they are trespassing. Therefore, adding the parcel to the park will not, in any tangible way, provide any new trails. If that parcel became part of the park, adding new trails (besides the existing North Trail) would be difficult due to the slopes in the area, not necessary for any lake access, and would impact the wilderness value of the park. And the state would likely not have the money to build or maintain any new trails, given the overall state of the entire park trail network. It would be good to know the probabilities for various outcomes concerning the McDonald property under the "No Action" alternative. Are the owners waiting for the Lodge proposal to become approved, and if it is not, will they try to sell the land? Or erect fences and negative signage to limit access? The state has attempted to requisition money to buy the property in the past, in a process not linked to any park development, so are future attempts likely to be successful? Due to a very challenging lack of public right-of-way to access the land, how likely is development of this parcel, given that it has not yet been developed in all these years? Page 3.7.3: There is similar wording about the McDonald Property here and on the next couple of pages, too: "This would increase the open space publically available in the park, increasing recreational opportunities in the area." As per above, this is misleading. Adding the parcel to the park, while clearly a good way to preserve the current recreational value of the park, does not tangibly add anything that is not already there. Buying the parcel only has the impact of removing a threat to the park's recreational value--one that has been present for almost 40 years. Letter 39 1 Page 3.7.3: I believe that it would be useful to state the likely percentage increase in park usage, and also to specifically call out the new potential usage of the park at night that is currently at extremely low levels. If the park has approximately 900,000 annual visitors, that is approximately 2466 per day, and adding 200 every day is an 8% increase. I don't believe this should be characterized as "minor". In this case, since there are numbers, reporting the actual increase would be informative. Also, nowhere is the likely new all-day usage of the wilderness area of the park called out or analyzed. Currently, the park closes at dusk, and gates are closed to prohibit vehicular entry and parking. So the only night-time usage at present is neighborhood pedestrians or those who park elsewhere, and the lack of legal parking in the area and the distance to get to trailheads are major obstacles. With 200 guests staying at a hotel in the core of the park, the park becomes a 24-hour activity zone. Page 3.3-10 mentions this with regard to the area near the hotel, but not for the trail system in the forested areas. Hotel guests hiking with headlamps and flashlights, while likely few in number, will still be a huge increase over current negligible usage and could have a large impact on nocturnal wildlife. A final issue with new park usage is related to the potential sale of alcohol at a restaurant or bar at the hotel. While state park rules forbid any establishment whose primary focus is the sale of alcohol, it seems certain that the lodge will have beer, wine, and liquor available to their guests. This has a potential to introduce loud and boisterous intoxicated individuals into what was previously a quiet park setting, especially at night time. Guests staying at the hotel don't have to drive home and may feel less need to limit their alcohol intake. Thank

you for considering my comments. --Greg Slayden 1314 4th Place Kirkland, WA 98033 425-703-4389 4 3  
2 Lodge at Saint Edward Section III Final Environmental Impact Statement Draft EIS Comments and  
Responses 3-139

RESPONSE TO LETTER 39 Slayden, Greg 1. The comment regarding the current use of the private 9.9-acre McDonald property by some users of the Park is noted. Although the private McDonald property may currently be utilized by park users for hiking, the formalization of this property as a part of the Park would represent a benefit to the Park. As indicated in Draft EIS Section 3.6 (Land Use) under the No Action Alternative, "it is possible that the property could be developed as single-family residential use as some point in the future, in adherence with City of Kenmore regulations." 2. Increased use of Saint Edward State Park and associated amenities by lodge hotel guests is analyzed as part of Draft EIS Section 3.7 (Recreation and Open Space). While an increase in visitors associated with the lodge hotel would result in increased use of recreational amenities in the park (particularly in close proximity to the Seminary Building), this increase would not be anticipated to be significant due to the large size of the park, the high rates of visitation and the provision of new area that would be added to Saint Edward State Park (the acquisition and transfer of the 9.9-acre McDonald Property to State Parks). Additional use of the park at night (including visitors traveling to and from the lodge hotel) is also analyzed as part of Draft EIS Section 3.6 (Land Use) and Section 3.8 (Light and Glare). 3. Draft EIS Section 3.3 (Wetlands and Plants/Animals) and Section 3.8 (Light and Glare) analyze the potential impacts to wildlife from increased evening usage within the Park, including increased noise, light and glare that could be generated during the evening hours as part of the Lodge at Saint Edward Project. 4. The comment regarding opposition to alcohol sales within the Park as part of the Lodge at Saint Edward Project is noted

Comments for City of Kenmore Notice of Availability of Draft EIS Kenmore Development Services Attn: Bryan Hampson PO Box 82607 Kenmore, WA 98028 To: Eilean Davis at [permittech@kenmorewa.gov](mailto:permittech@kenmorewa.gov) [bhampson@kenmorewa.gov](mailto:bhampson@kenmorewa.gov)

I have reviewed the DEIS for the Lodge at St. Edward Park Proposal. The draft contains several inadequacies, which I have outlined below. The project should not go forward unless and until these inadequacies are addressed. Sincerely, **David Stokes**, PhD Kenmore, WA

Increased landslide potential at a site west of project site The proposed increase in the impermeable surface area could exacerbate slope stability problems to the west of the project area. The most popular trail from the Great Lawn to the lakeshore, the Seminary Trail, regularly sustains damage at the site of a prominent and chronic landslide and mudflow. Large trees have also been lost at this location. In addition to the ecological and resource damage, this presents an ongoing maintenance problem for the park. Changes in water flow and/or hydrology due to increases in impermeable surface on the west side of the proposed project could exacerbate this process. New parking construction could also increase the hydrologic impacts at this site. This issue is not addressed in the draft EIS. Insufficient consideration of impacts to salmonids in Stream A The DEIS states that no impacts to salmonids will occur because salmonid habitat does not exist in the study area (DEIS p. 3.3-7). However, Stream A is designated as salmonid habitat downstream of the project site (DEIS p. 3.3-3), and it is well known that a host of environmental influences likely to result from additional road and parking surfaces (e.g., pollutants, sediment, altered water volumes, altered water temperatures) have negative downstream impacts on salmonids and salmonid habitat. These impacts are not addressed. Letter 41 2 1 The DEIS also states that the small size of the Stream A watershed suggests Stream A does not support fish (DEIS p. 3.3-7). This statement needs justification. Stream size may be correlated with numbers of salmon, but is less likely to predict presence or absence of salmonids. Given the highly sensitive ecological and legal state of salmon in the area, negative impacts to even small numbers of salmon should be avoided, particularly in a State Park, where environmental protection is a primary part of the mission. Incomplete herpetological survey and failure to note presence of Northern red-legged frog. Northern red legged frog (*Rana aurora aurora*) was documented to be present in St. Edward Park (Klaus Richter, PhD and former King County amphibian specialist), but is not mentioned in the report. This species is on the List of Species Protected in the King County Comprehensive Plan and CAO, and according to Klaus Richter, St. Edward Park is likely the only location in the greater Kenmore, Kirkland, and Lake Washington area that still supports Northern red-legged frog. Changes to ground water and wetlands caused by the project could negatively affect this species. Inadequate consideration of wildlife impacts Following the list of amphibians present (DEIS p. 3.3-8) the DEIS states "...The majority of these species that readily adapt to human induced changes..." (DEIS p. 3.3-8). This indicates the DEIS is incomplete, as it should address all impacts, not impacts to the majority of species, which might be able to withstand the impacts. Impacts to the putative minority of species that are vulnerable should be particularly carefully addressed, since those are the very species most likely to be negatively affected. Some of the species that the DEIS indicates are likely to be favored by the development (e.g. crows [DEIS p. 3.3-8, 3.3-10]) are edge species which have well documented negative impacts on forest bird species. The impacts of these edge species (e.g., crow populations subsidized by garbage) are not addressed. Furthermore, the

DEIS's contention that wildlife species are likely to "readily adapt to human induced changes" (DEIS p. 3.3-8) is a vague statement, too general to be meaningful in this context. The question at hand is, how will the particular species present adapt to the particular changes associated with the proposed project? Many species, for example Pacific giant salamander (note that scientific name is incorrect [DEIS p. 3.3-8] for this species), and others not mentioned (e.g., hermit thrush), probably will not readily adapt to human induced changes, and will likely be reduced or eliminated. Such an outcome would seem to be at odds with the mission of Washington State Parks. Failure to consider impacts of tree removal on remaining forest The forest of St Edward Park is an exposed forest fragment surrounded by vegetation of mostly smaller stature. As a result, wind throw claims a large number of trees in the park. The removal of trees in the study area as part of the proposed development (DEIS p. 3.3-9) has the potential to increase the exposure to remaining mature trees to wind damage. Potential loss of forest as a result of removal of these trees is not addressed in the DEIS. Insufficient consideration of impacts of increased traffic and night traffic to wildlife The DEIS correctly states that increased traffic and night traffic is likely to cause negative impacts to reptiles and amphibians (DEIS p. 3.3-10). Traffic-related impacts have been shown to be one of the leading threats to many wildlife species, as well as a leading cause of degradation of habitat quality, not only for reptiles and amphibians, but for many mammal and bird species as well. Since many of these species travel at night, increases in night traffic are particularly harmful. A major threat of traffic is wildlife injury or mortality, but there are other effects, such as disruption of movement, genetic isolation, and reduced habitat quality. However, the analysis of this threat in the DEIS is too general to be meaningful. To be able to properly assess the threat, the analysis must be much more species-, site-, and impact-specific. Insufficient mitigation of impacts of increased traffic and night traffic to wildlife Given the many diverse and potentially serious impacts of traffic to wildlife, the proposed mitigation measure (posting of speed limit signs [DEIS p. 3.3-13]) is inadequate. More detailed analysis of mitigation measures is needed, including consideration of traffic volumes and vehicle speeds, as well as species movement characteristics, dispersal patterns, and movement speeds. Stated wildlife impacts are inconsistent with State Parks mandate The DEIS states that as a result of the impacts of project-related traffic, "...the project could reduce the abundance and diversity of wildlife within and immediately adjacent to the project site, particularly at night" (DEIS p. 3.3-10). This, and similar impacts to wildlife of noise, light, and other forms of disturbance, make the project inconsistent with State Parks mission to protect the environmental quality of the State parks. Insufficient mitigation of noise and night lighting impacts to wildlife Similar to traffic, analysis of impacts of noise and night lighting need to be more in-depth and case-specific, and the mitigations proposed more substantive. Unmitigated impacts should be considered in the context of the mission of State Parks, which includes stewardship of environmental quality on its lands.

RESPONSE TO LETTER 41 Stokes, David PhD

1. The comment regarding stormwater and potential impacts to slope areas to the west of the site are noted. As indicated in Draft EIS Section 3.2 (Water Resources), new impervious surfaces under the EIS Alternatives would require stormwater management features that would be designed to be consistent with the applicable requirements of the 2009 King County Surface Water Design Manual (KCSWDM), as adopted by the City of Kenmore. The preliminary stormwater management design for the project would be intended to provide flow control and water quality facilities, and would be required to discharge at a natural location with no significant impacts to downstream areas. The stormwater management design would undergo full drainage review by the City of Kenmore as part of the site plan review process and building permit process to ensure compliance with the KCSWDM, as adopted by the City of Kenmore, including flow control and water quality requirements. 2. The classification of the upper reach of Stream A as Type 4 (Type N) is based on observed natural barriers and gradients in excess of 16 percent. This classification aligns with publicly-available sources, including WDFW Salmonscape and DNR FPARS maps. As described in the DEIS, the closest salmonid use in Stream A is mapped as 0.5 miles downstream from the project area. Critical areas documented in the Stream & Wetland Delineation Report, Saint Edward State Park Seminary (The Watershed Company, Rev Aug 2016) as referenced in the Draft EIS are at the outer edge of the study area, which extended 300 feet beyond the project site. This places proposed site development well beyond standard buffer widths under City of Kenmore municipal code, and beyond the distance at which development is likely to affect stream functions. Stream A lies within a native mixed conifer and deciduous forest stand. The existing riparian corridor provides shading and allochthonous (organic debris) inputs to the stream. As noted in the comment, conditions in this upper reach stream segment are important to maintaining stream health and specifically salmonid habitat downstream. None of the proposed project alternatives would directly impact the vegetation in the existing forested corridor or its ability to protect water quality (e.g. temperature regulation, nutrient and sediment filtration) or provide detritus sources to the stream channel. Adherence to City of Kenmore requirements and the 2009 King County Surface Water Design Manual are expected to manage flows and water quality for stormwater draining from the proposed development to maintain existing natural drainage patterns, and the integrity of the riparian zone around Stream A. In summary, the project will not alter the intact forest surrounding Stream A; existing riparian functions will be maintained. Adherence to stormwater management Lodge at Saint Edward Section III Final Environmental Impact Statement Draft EIS Comments and Responses 3-146 requirements should prevent direct impacts to Stream A and downstream salmonid habitat. 3. The Habitat Assessment, Saint Edward State Park Seminary (The Watershed Company, September 2016) as referenced in the Draft EIS describes fish and wildlife species of local importance as defined in the Kenmore city code. Per KMC 18.55.500, designation of fish and wildlife habitats of importance is defined as follows: A. Fish and wildlife habitats of importance are those habitat areas that meet any of the following criteria: 1. Documented presence of species listed by the federal government or the State of Washington as endangered or threatened; or 2. Heron rookeries or active nesting trees; or 3. Class 1 wetlands as defined in these regulations; or 4. Type 1 streams as defined in these regulations. 5. Bald eagle habitat shall be protected pursuant to the Washington State Bald Eagle Protection Rules (WAC 232-12-292). B. All areas within the City meeting one or more of these criteria, regardless of any formal identification, are hereby designated critical

areas and are subject to the provisions of this chapter. C. The City may accept and consider nominations for habitat areas and species to be designated as fish and wildlife habitats of importance. Nominations will be accepted on an annual basis. Guidelines for nomination are available from the city manager. The Northern red legged frog (*Rana aurora aurora*) is not currently on the State of Washington Priority Habitats and Species List<sup>1</sup>. According to Washington Department of Natural Resources Natural Heritage Program, the taxon is of long-term concern, but it is widespread, abundant, and apparently secure in the state, with many occurrences<sup>2</sup>. Moist forested habitats within the park are presumed to support native herptiles, including the Northern red legged frog and other species, such as Pacific chorus frog. The proposed development will be placed outside of forested corridors, maintaining existing herptile habitat. Adherence to required stormwater management and the preservation of well-vegetated wetland buffers are expected to maintain groundwater and surface water quality and quantity. 4. The Lodge at Saint Edward Project site is located an area of the park that is currently characterized by buildings, parking lots, and mowed lawn. Surrounding intact forested corridors contain a network of trails utilized by park users and their pets. Current site 1 Washington Department of Fish and Wildlife. August 2008, updated June 2016. Priority Habitats and Species List. 2 Washington Department of Natural Resources. Updated 2009. Natural Heritage Program. Lodge at Saint Edward Section III Final Environmental Impact Statement Draft EIS Comments and Responses 3-147 conditions support many species known to readily adapt to human induced changes. Avoiding direct impacts to surrounding forested acreage within the park maintains habitat for species that habitually utilize the park. The 316-acre park is primarily forested. Forested areas where species like the Pacific giant salamander (*Dicamptodon tenebrosus*) likely reside, will not be altered under the proposed project. Since the project would be located within an area already dedicated to developed human use, it is not anticipated to alter wildlife use in or around the project area. Preserving and maintaining forested areas of the park is consistent with Washington State Park's stewardship program objectives. 5. Draft EIS Section 3.3 (Wetlands and Plants/Animals) and the referenced Tree Inventory and Arborist Report (on-file with the City of Kenmore) identify potential impacts to trees from the Lodge at Saint Edward Project, including the removal of certain trees to accommodate the proposed parking areas. Trees identified for removal under the EIS Alternatives are primarily located within or at the edge of already cleared areas of the central portion of the park and include trees that were determined to be in poor condition and recommended for removal by the Arborist Report. 6. Proposed traffic use and speed on the existing access road are generally considered to be low-volume and low-speed. As documented in the Draft EIS Section 3.12 (Transportation), existing peak AM- and PM-hour traffic volumes at the intersection of NE 145th Street & Juanita Drive NE are 380 and 336 vehicles, respectively. Speed limits go from 25 miles per hour (mph) on NE 145th Street. (for approximately one-quarter mile) to 15 mph west of the "Y" on the access road to the seminary site. While Saint Edward State Park is currently closed at night, the neighboring Bastyr University campus and associated ballfields are not. Given that the access road is less than one mile in length and the speed limit along the road is 25 mph or 15 mph, vehicle collisions with wildlife are expected to be infrequent and limited to slow-moving wildlife species, like reptiles and amphibians<sup>3</sup>. Without the project, vehicle trips on the access road are projected to increase between 2016 and 2020 by 70 (18%) and 257 (76%) vehicles during peak AM and PM hours, respectively. The projected additional increase in number of vehicles on the access road during peak AM and PM hours associated with the project is 67 and 83, respectively. The change in night traffic was not analyzed

during the transportation analysis, but is anticipated to increase. Current night traffic to Bastyr and the associated ballfields is likely low volume, but present, along much of the access road to the seminary. The proposed project will not change the length of the existing ingress/egress road. Therefore, the proposal will not result in new physical fragmentation of on-site habitat. 3 Huijser, M.P., et al. August 2008. Wildlife-Vehicle Collision Reduction Study: Report to Congress. Publication Number: FHWA-HRT-08-034. US Department of Transportation, Federal Highway Administration Research and Technology. Accessed online: November 29, 2016.

(<https://www.fhwa.dot.gov/publications/research/safety/08034/08034.pdf>) Lodge at Saint Edward Section III Final Environmental Impact Statement Draft EIS Comments and Responses 3-148 While the road is not expected to act as a total barrier to movement, increased traffic may disrupt movement. Increased use of the road during day and night times may increase reptile and amphibian mortality due to vehicle collisions. A study in Ottawa, Canada found that an approximately one order of magnitude increase in traffic correlated with increased road-associated amphibian mortality and a decrease in overall amphibian densities<sup>4</sup>. Another study of more minor changes in traffic volumes (i.e., 5–26 vehicles/hr) on a low volume road can have varying effects on road-related mortality depending on the amphibian species<sup>5</sup>. Impacts of traffic to wildlife are expected to be infrequent and limited to slow-moving wildlife species (see above). Modifying driver behavior by lowering vehicle speeds is one way in which wildlife-vehicle collisions can be mitigated<sup>6</sup>. To enforce speed limits, signs should be posted. 7. The comment regarding State Parks mission related to protecting the environmental quality of parks is noted. The Washington State Parks and Recreation Commission considers many factors when making decisions related to State Parks, including the cited mission statement. As indicated in Chapter 2 of the Draft EIS, “In September 2014, the Washington State Parks and Recreation Commission considered a range of management options for the Seminary Building, ranging from rehabilitation to demolition of the building. A SEPA checklist was prepared and a non-project Determination of Nonsignificance was issued related to the Commission’s consideration of the management options. The poor condition of the building and subsequent cost to stabilize and rehabilitate the building was discussed. The Commission directed staff to “explore rehabilitation as the preferred management option for the Seminary Building, ensuring that proposals brought before the Commission include sufficient details and merit to reasonably assure prospects for success. If, at the conclusion of 12 months of exploration, the Director determines there is no reasonable proposal for rehabilitating the Seminary Building, then the building will be vacated.” In September 2015, the Commission approved a one-year extension of their prior management direction to allow for a potential rehabilitation proposal to be brought to the Commission for consideration. At their September 22, 2016 meeting, the Commission approved another extension to allow for a potential rehabilitation and lease proposal to be submitted to the Commission.” 8. The comment regarding noise and lighting impacts is noted. Draft EIS Section 3.4 (Noise) and Section 3.8 (Light and Glare) include an analysis of potential noise and lighting impacts from the EIS Alternatives. Draft EIS Section 3.3 (Wetlands and 4 Fahrig, L. J. Pedlar, S. Pope, P. Taylor, and J. Wegner. 1995. Effect of road traffic on amphibian density. *Biological Conservation* 73:177-182. 5 Mazerolle, M. 2004. Amphibian road mortality in response to nightly variations in traffic intensity. *Herpetologica* 60(1):45-53. 6 Huijser, M.P., et al. August 2008. Wildlife-Vehicle Collision Reduction Study: Report to Congress. Publication Number: FHWA-HRT-08-034. US Department of Transportation, Federal Highway Administration Research and Technology. Accessed online: November 29, 2016.

(<https://www.fhwa.dot.gov/publications/research/safety/08034/08034.pdf>) Lodge at Saint Edward  
Section III Final Environmental Impact Statement Draft EIS Comments and Responses 3-149  
Plants/Animals) also provides an analysis of potential nighttime noise and lighting impacts on wildlife.